

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

ROHALEY AND SON)	Case No: 1:18-cv-2825-CAB
AUTOMOTIVE, INC.)	
AKA ROHALEY AND SON)	Hon. Christopher A. Boyko
AUTOMOTIVE)	
7481 Brenel Drive)	
Mentor, OH 44060)	
)	
Plaintiff,)	
vs.)	
)	
TRAVELERS CASUALTY INSURANCE)	<u>AMENDED COMPLAINT</u>
COMPANY OF AMERICA)	
One Tower Square)	(Trial By Jury Demanded)
Hartford, CT 06183)	
)	
Defendant.)	

Now comes the Plaintiff Rohaley and Son Automotive, Inc. by and through undersigned counsel, and for its Amended Complaint against defendant Travelers Casualty Insurance Company of America, alleges, avers and states as follows:

PARTIES

1. Plaintiff Rohaley & Son Automotive, Inc. is a corporation, in good standing, organized and existing under the laws of the State of Ohio with its principal place of business located at 748 Brenel Drive, Mentor, Ohio 44060. During all relevant times alleged herein, Chad Leonard was the sole shareholder and owner of the company.

2. Travelers Casualty Insurance Company of America ("Travelers") is named a defendant herein. Travelers is a Connecticut corporation with its principal place of business in Hartford, Connecticut and conducts business in Lake County, Ohio.

JURISDICTION AND VENUE

3. Plaintiff re-alleges and re-avers each and every allegation contained in Paragraphs 1 and 2 of this Amended Complaint as if fully rewritten herein.

4. This Court has subject matter jurisdiction over the claims set forth in Plaintiff's Amended Complaint.

5. This Court has personal jurisdiction over Traveler's.

6. This action is properly venued in this Court.

FACTS

7. Plaintiff re-alleges and re-avers each and every allegation contained in Paragraphs 1 through 6 of this Amended Complaint as if fully rewritten herein.

8. Traveler's sold Plaintiff commercial general liability insurance and businessowners property coverage.

9. A copy of the Declaration and Policy regarding the liability insurance Traveler's sold to Plaintiff is not attached hereto as it is voluminous and bulky and Traveler's has a true and accurate copy of it. ("Insurance Policy").

10. The effective date of the Insurance Policy was December 16, 2015 through December 16, 2016 and renewed on December 16, 2016.

11. Upon information and belief, the Insurance Policy was a claims made policy.
12. The Insurance Policy provides that a claim will be deemed to have been first made against the insured when any insured first receives written notice of the claim.
13. On or about May 24, 2017, Plaintiff reported losses of equipment, tools, vehicles, lost profits and parts to Traveler's.
14. On or about July 24, 2017, Traveler's denied coverage pursuant to a letter explaining the details for the denial. A true and accurate copy of said letter is attached hereto and marked as Exhibit "A."
15. On or about August 17, 2017, Plaintiff sent a letter to Traveler's appealing the denial. A copy of said letter is attached hereto and marked as Exhibit "A."
16. On or about March 14, 2018, Traveler's again rejected and denied the claim pursuant to the explanation detailed therein. A true and accurate copy of said letter is attached hereto and marked as Exhibit "B."
17. Traveler's denial of Plaintiff's claim under the insurance was contrary to and in breach of the terms of the insurance policy.
18. As a direct, proximate and foreseeable result of Traveler's failure to honor Plaintiff's claim, Plaintiff has been damaged in an amount in excess of \$25,000.

COUNT I

(Breach of Contract)

19. Plaintiff re-alleges and re-avers each and every allegation contained in Paragraphs 1 through 18 of this Amended Complaint as if fully rewritten herein.
20. The Insurance Policy constitutes a contract between the parties.

21. Plaintiff complied with all terms and conditions precedent for coverage of the claim it had submitted to Traveler's pursuant to the terms of the Insurance Policy.

22. Notwithstanding, Traveler's breached the provisions of the Insurance Policy in denying and failing to pay Plaintiff's claim.

23. Traveler's denial and failure to pay Plaintiff's claim constitutes a breach of the Insurance Policy.

24. As a direct, proximate and foreseeable result of Traveler's breach of contract, Plaintiff is entitled to damages in an amount in excess of \$25,000.00.

COUNT II

(Declaratory Judgment)

25. Plaintiff re-allege and re-aver each and every allegation contained in Paragraphs 1 through 24 of this Complaint as if fully rewritten herein.

26. A real and justifiable controversy exists between the parties as to Plaintiff rights to coverage for the claim made under the terms of the Policy.

27. The controversy between the parties is justiciable in character.

28. A speedy resolution to the controversy between the parties is necessary to the preservation of the rights of Plaintiff.

29. Speedy relief is necessary to preserve the rights of the parties.

30. Plaintiff is entitled to bring this declaratory judgment action pursuant to Ohio Revised Code Section 2721.03.

31. Plaintiff is entitled to a declaratory judgment that Traveler's is obligated to provide coverage for the claim made under the terms of the Insurance Policy as well as adjudication of the extent of damages owed by Traveler's to Plaintiff under the terms of the Policy.

COUNT III

(Bad Faith)

32. Plaintiff re-allege and re-aver each and every allegation contained in Paragraphs 1 through 31 of this Complaint as if fully rewritten herein.

33. Pursuant to the terms of the Insurance Policy and/or applicable law, Traveler's owed a duty to Plaintiff to act in good faith in handling and paying Plaintiff's claim under the terms of the Insurance Policy.

34. Traveler's has breached its duty of good faith owed to Plaintiff by, among other acts, failing to timely adjust the claim and denying coverage for the claim.

35. Traveler's conduct towards Plaintiff as described above lacked reasonable justification.

36. As a direct and proximate result of Traveler's breach of its duty of good faith, Plaintiff have sustained damage in an amount in excess of \$25,000 as well as incurring attorneys' fees.

WHEREFORE, for the foregoing reasons, Plaintiff respectfully request that this Honorable Court render a judgment in Plaintiff favor against Traveler's and provide Plaintiff with the following relief:

Issuing a declaratory judgment declaring that Plaintiff are entitled to coverage under the terms of the Policy for the loss;

Awarding a money judgment in favor of Plaintiff and against Traveler's in an amount in excess of \$25,000.00 for compensatory damages related to the loss;

Awarding a money judgment in favor of Plaintiff and against Traveler's in an amount in excess of \$25,000.00 for punitive damages related to Traveler's breach of its fiduciary duty and bad faith;

An award in favor of Plaintiff and against Traveler's for reasonable attorneys' fees;

Pre- and post-judgment interest;

An award of all costs incurred herein;

Such other and further relief as this Honorable Court may deem appropriate and equitable.

Respectfully submitted,

/s/**Gregory M. Lichko**
Gregory M. Lichko (0032544)
LICHKO & SCHECHTER
120 Bridge Building
18500 Lake Road
Rocky River, Ohio 44116
440-331-5223

CERTIFICATE OF SERVICE

I hereby certify that on March 12, 2019, I electronically filed the foregoing with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

Gregory M. Lichko (0032544)
LICHKO & SCHECHTER
120 Bridge Building
18500 Lake Road
Rocky River, Ohio 44116
glicheko@lichkoschechter.com
Attorneys for Plaintiff

August 17, 2017

CHAD M. LEONARD
ROHALEY AND SON AUTOMOTIVE INC.
7481 BRENEL DRIVE
MENTOR, OH 44060

TRAVELERS CASUALTY INSURANCE CO.
P.O. Box 3204
NAPERVILLE, IL 60566-7204
Stephen Brasher
Claim Professional
Direct (630) 961-4418
Office (800) 842-6172 Ext. 961-4418
Email: SBRASHER@travelers.com

RE: Insured: Rohaley and Son Automotive Inc.
Chad Leonard
Policy No.: 680-OE628194
Claim No.: DHR0975
Date of Loss: 01-07-2017
Loss Location: 8654 & 8656 Twinbrook Road
Mentor, OH 44060

Dear Mr. Brasher,

Please accept this Letter and Exhibits as an appeal to your letter and conversation. The following information will show that the Policy should cover the claim. Equipment, tools, vehicles and parts were stolen after the business was suspended on October 28, 2016.

Rohaley and Son Automotive is an S-Corp, which is a stock based corporation. Albert Rohaley owns no stock- (See Exhibit 3, page 13, line 2, 3, and 4.) Mr. Rohaley quit all responsibilities with the company October 28, 2016. **Therefore, admittedly, Mr. Rohaley was not a stockholder, partner nor a manager of Rohaley & Son Automotive Inc. when the theft occurred.** Also, the staff quit and moved to Rohaley's Auto and Truck Repair LLC with Mr. Rohaley on that same date.

To clarify, Rohaley and Son Automotive was named as such as part of a marketing plan as Mr. Rohaley had an "automotive customer following". This sometimes is confusing that the company is owned and operated through Chad M. Leonard. Mr. Rohaley was given an opportunity to "buy-in" if he chose in the future, but, he chose not to.

While you are correct, I have been in Civil Litigation with Mr. Albert Rohaley since September, 2015, I am only requesting monetary reimbursement for property which was taken from my business, as well as loss of business, which occurred between October 28, 2016 and January 5, 2017, and loss of business from November 1, 2016 through present.

John B. Devorsky
Sworn to before me on this 17th day of August 2017
1st John B. Devorsky
Commission expires: February 13, 2022



In September, 2015, Mr. Rohaley was no longer a trusted employee. However, before litigation began, he locked me out of the facility, changed the locks, security code, and bank accounts in addition to leveled threats to me and my family. This resulted in filing for a Protection Order and asking for police intervention/investigation.

At that time I tried to file embezzlement, etc. charges through the judicial system and eventually I had to file for a Preliminary Injunction to do everything legally to protect my property. Due to the complexity of the court system, the TRO was not set into place until May, 2016.

I understand that the details leading up to this situation are not typical. However, **what is fact, property went missing after October 28, 2016.** (Exhibit 1 pictures)

In reference to **B. Exclusions, Section m**, stating; "property that is missing, where the only evidence of the loss is a shortage upon taking inventory, or other instances where there is no physical evidence to show what happened to the property". I had Larry Bodnar, my agent there so he could witness missing property before filing my claim. (Exhibit 5). I was court ordered to do an inventory as part of the civil suit. Although it was prior to filing the insurance claim, keep in mind that the court system dictated to me the way and frequency for which I was to do the inventory and I was always with assigned court ordered third parties. (Exhibit 6). **I suspect the before and after evidence I presented to you is more thorough than most claims you encounter.**

According to **Traveler's procedure in section MPT 1020205, on page 27, number 3**, "duties in the event of loss or damage number 5 states clearly, "at our request, give us complete inventory of the damage and undamaged property include quantities, costs, values and amount of loss claimed." **I have already submitted this evidence to you with the initial claim.**

In summary, to clarify my claim with you related to the equipment and property has everything to do with dishonest and criminal acts that occurred after October 28, 2016. On that date, the only member of the company was me, Chad Leonard, and I had no access to the premises via key or security code until I was escorted back into the building on January 5, 2017 per court order.

The Civil Case has to do with what Mr. Rohaley did while employed. I cannot seem to make Mentor Police understand this, and therefore, they will not investigate. I certainly have my suspicions as to where the property is. I know that it is hearsay.

I also included some rather interesting emails related to both Albert Rohaley and Alec Rohaley, his son and former employee, who was terminated March 19, 2015 for malicious behavior, assaulting another employee on March 14, 2015. Both were attempting to cancel the insurance policy on December 12, 2016 and then again within

Sworn to before me on this 17th day of August 2019.

2) *John B. Devorsky*

Commission expires: February 13, 2022



the last two months, per Larry Bodnar, our agent. I would consider that at best "suspicious". I would think that this behavior is to keep your insurance company from investigating further. It is odd that two former employees, who no longer have anything to do with the business, would even care whether Rohaley and Son Automotive is or is not insured.

In Conclusion, after reading your letter dated July 24, 2017, I believe your denial of my claim is not justified. Section MP T1 02 02 05 Is Covered Property. H, I and M Every time I went to 8654 Twinbrook I was under a TRO and Mentor Police Officers and/or court appointed personnel were with me.

The Theft was done after the employees resigned and went to work for another company. Mr. Albert Rohaley under oath in court said he was not there when the theft happened, between October 28, 2016 through January 5, 2017. (Exhibit 4)

Should you have any questions regarding this matter, please contact the undersigned.

Enclosed are just some of the rationale and evidence discussed above which I believe support approval of my Claim.

Sincerely,

Chad M Leonard
(440) 487-0869
Email: CMLHoldingsinc@gmail.com

EXHIBITS/EVIDENCE

Exhibit 1 Before and After Pictures (5 Pages) Proof property is missing.

Before and After Pictures: 5 of 5 pages of pictures showing Stolen Examples of tools and Equipment on site 8654 & 8656 Twinbrook Rd. (Rohaley & Son Automotive Inc.) October 28, 2016 and Stolen before January 5, 2017. Witnesses were present.

Per Court Order Lake County - Judge Collins (Inspection of 8654 & 8656 Twinbrook Rd.)

Visit to Rohaley & Son Automotive at 8654 Twinbrook Rd. Mentor, OH

2 Mentor Police Officers escorted Chad Leonard (per Court Order)

All assets were at 8654 & 8656 Twinbrook Rd. By a TRO Business was to run as usual. Pictures were taken...

October 28, 2016 Last Pay Checks were given to all employees

Sworn to before on this 17th day of August 2017

Opal B Devorsky

Commission expire: February 13, 2022



November 1, 2016 Against TRO, Business was suspended by Manager Al Rohaley. He said in two Court Hearings, Federal and County.
Exhibit 3 "He Quit" Page 4 Line 5-6 Page 19 Line 14 -18

Exhibit 2 Judge Collins December 23, 2016 Opinion and Judgment Entry
(Cover page and page 9)

Exhibit 3 Transcript for Federal Bankruptcy Case No. 17-10514 March 2, 2017

(Cover page and page 4,-lines 5 and 6, page13-lines 2 and 3 and page 19-lines 4-18)

Albert Rohaley admits that he does not own any Stock (Page 13 Line 2-3) I am not asking for replacement of the Workers Tools and Boxes. They removed them, against the TRO, to work at Rohaley's Auto and Truck Repair LLC. We are asking for replacement of all stolen tools, equipment, and parts that were purchased by Rohaley & Son Automotive Inc.

(See Stolen Contents Worksheets) tools sheets **Exhibit 8** and see canceled checks copies, **Exhibit 7**)

November 16, 2016 Hearing the Lake County Judge Collins states "The Company is just a shell." (See Judges Entry dated December 23, 2016 Exhibit 4 and Page 9 Last Paragraph)

January 5, 2017 found out equipment, tools, vehicles, and parts are stolen from Rohaley & Son Automotive Inc.

Witnesses: (See Sheet **Exhibit 5**)

Mike Levan - Owner of building& Landlord of Property with key to 8654 & 8656 Twinbrook Road, Mentor, OH

Larry Bodnar - Insurance Agent for Travelers Insurance

Erik Walters - Dworkin and Bernstein, my Attorney

Two MPD officers did not sign in. Timothy Abbott was the senior officer.

Exhibit 4 Transcript for Lake County Court Case No. 15CV1937

November 16, 2016

(Cover sheet and page 56 lines 7 and 8 and lines 14-21)

Exhibit 5 January 5, 2017 Witnesses Sign- in Sheet. (All witnesses can attest to missing equipment, etc.) Clearly shown in pictures.

Exhibit 6 April 25, 27, 28, & May 2, 2017

Witnesses to Inventory and Removal to 3 Shipping Containers

Sworn to before me on this 17th day of August

John B. Devovsky

Commission expire : February 13, 2022



Exhibit 7 Cancelled Checks

Exhibit 8 Contents Worksheets (5 Pages)

Exhibit 9 Evidence of attempted cancellation of insurance policy by Albert and Alec Rohaley. (Copies of emails)

Sworn to before me on this 17th day of August 2017.

Joni B Devorsky

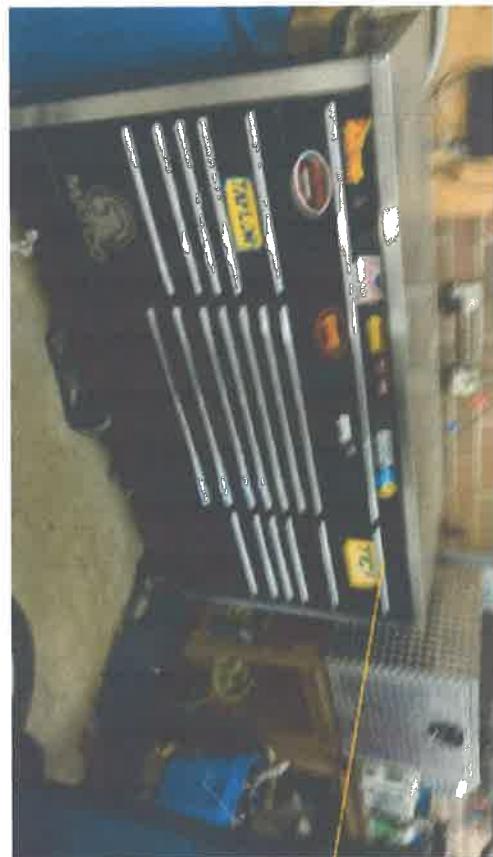
Commission expires: Feb. 13, 2022



Item 189 Matco 4325RP 4S Triple Bay Tool Box

*JONNI B DEVORSKY
Sworn to and before me on this 17th day of August 2017.*

Commission expires: Feb. 13, 2022



BEFORE



AFTER

Sworn to and personally appeared before me on this 14th day of August 2017.
JONNI B. DEVERSKY
Commission expire: February 13, 2022

Item 2 EWH326A Tire Changer



Items 12 13 14 4PC Tool Chest & Top Box



BEFORE



AFTER





Item 11 53 in wide 6 Draw Blue Tool Box

Sworn to and personally appeared before on this 17th day of August 2019.



commission expires: Feb. 13, 2022



BEFORE



AFTER



Item 1. 115-5012592-001 Alignment Rack/ Lift Complete

Sworn to and personally appeared before me on this ^{10th day of August 2019.}



Commission expires: February 13, 2022

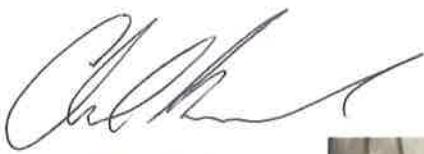


BEFORE



AFTER





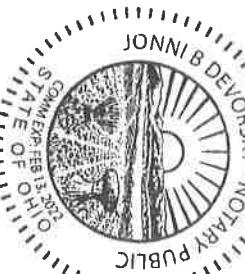
Item 8 KRL7022 Roll Cab Box



Sworn to and personally appeared before on this 17th day of August 2017

Jonni B. Devorsky

Commission expired: Feb. 13, 2022



Item 9 KRA2407PC Roll Cab Box



Before



After

EXHIBIT 2

IN THE COURT OF COMMON PLEAS

FILED

LAKE COUNTY, OHIO

2016 DEC 23 P 2-39.

CHAD M. LEONARD HOLDINGS,)
INC., et al.)
Plaintiffs,) CASE NO. 15 CV 001937
vs.) CONSOLIDATED WITH 16 CV 000126
Defendants.)
ALBERT C. ROHALEY, et al.)
December 23, 2016
)
OPINION AND JUDGMENT ENTRY
)
)

A show cause hearing was held before this court on November 16, 2016. Plaintiffs were Chad M. Leonard (Leonard) and Chad M. Leonard Holdings, Inc. Defendants were Albert C. Rohaley, II (Rohaley), and Rohaley and Son Automotive, Inc. Defendants did not file a brief in opposition to plaintiffs' initial motion for a show cause hearing. At issue is whether Rohaley should be held in indirect civil and criminal contempt for failing to comply with the terms of a stipulated prohibitory preliminary injunction filed by this court on May 24, 2016.

Rohaley and Son Automotive, Inc. is a subchapter S corporation formed in December 2013 for the purpose of operating an automobile repair business. It opened for business the first week of January 2014 and quickly became a profitable business. Rohaley and Chad M. Leonard Holdings, Inc. are fifty percent owners with each holding 250 shares. Rohaley has extensive experience in vehicle repairs and is the agent, president and treasurer of the company. Chad M. Leonard, the president of Chad M. Leonard Holdings, Inc., is the vice president and secretary of Rohaley and Son Automotive, Inc. Chad M. Leonard Holdings, Inc. provided the start up money to open up the business which was set up in Mentor, Ohio. Chad M. Leonard Holdings, Inc. considered the start up money to be a loan (\$54,000) that was to be paid back. No written documents or testimony by Leonard were provided as evidence of this claim. Rohaley did testify that he stopped paying on this 'loan' in August 2015. It is unknown if any dividends or distributions were made to the shareholders.

Disputes between Rohaley and Leonard arose early in 2015 and their relations gradually became unworkable. Leonard claims he was essentially excluded from the business site by the summer of 2015. Fearing that funds and assets of the business was being diverted by Rohaley,

15CV1937.wpd

Sworn to and personally appeared before me on this 19th day
of August 2019.

Janice B. Devorsky

Commission expires: Feb. 13, 2022



EXHIBIT 2

was a 5,800 square foot facility with six automobile lifts. It is likely that all that is left of the old facility is the six automobile lifts and various bills. Rohaley testified that both he and Chad Leonard personally guaranteed the debts of the old business. It is unknown if the debts of the old company (Rohaley and Son Automotive, Inc.) has been paid off.

Rohaley testified that the phone number to Rohaley and Son Automotive, Inc. was disconnected on November 15, 2016 and that calls to that number were automatically forwarded to his cell phone number. This had the effect of diverting customers to the new business. This was done by Rohaley without Leonard's permission because Leonard was not paying the bills. Exhibit BB is a photograph of the door to the old facility with a hand lettered sign directing customers to go to the 'new' location across the street. Rohaley testified that he put the sign up. Exhibit CC is a photograph showing the sign for the new business. Rohaley testified that he shut down the old facility and moved across the street because Leonard was unreasonable.

As mentioned above, customers calling the old business were diverted to the new business. Evidence also shows that the new business (Rohaley's Auto & Truck Repair LLC) intended to move into the old facility at the beginning of 2017 after the lease expired for Rohaley and Son Automotive, Inc. Exhibit FF is an affidavit of Christina Smith who called Rohaley and Son Automotive, Inc. on Monday, October 31, 2016 at 2:08 p.m. The number she called was 440-266-0000 which was the phone number listed on Rohaley and Son Automotive, Inc.'s website (<http://rohaleysandsonautomotive.com>). An individual named "Al" answered the phone and said that business had moved across the street from its original location. "Al" said the move was temporary until the lease expired and then they would be moving back into the old spot. Exhibit GG is an affidavit of Christopher Veray. He called Rohaley and Son Automotive, Inc. at 440-266-0000 on Thursday, November 3, 2016. "Al" came on the line and stated that the shop moved across the street, down one building from the old locations, diagonal from where the original shop was located. "Al" explained that they could not do coolant flush because they had just moved and downsized temporarily for a couple of months. The coolant system on Veray's car could not be done until beginning of the year.

The court finds beyond a reasonable doubt that Rohaley stripped the old business and facility of some of its repair parts and all of its employees and moved them to a nearby facility. This was contrary to the intent of the preliminary injunction to maintain the status quo and maintain the business as a going concern. Since these events occurred after the date of the preliminary injunction, the court finds Rohaley in indirect criminal contempt for violating paragraph (b) and (c) of the preliminary injunction by removing parts and closing the old business.

ISCV1937 wpd

Chad Rohaley 9
Sworn to and personally appeared before on this 17th day of August 2017.

Jonni B Devorsky

Commission expires: Feb. 13, 2022



EXHIBIT 3

1

IN THE OFFICE OF THE UNITED STATES TRUSTEE
State of Ohio
City of Cleveland

IN RE:
* * * * * Case No. 17-10514
ALBERT CHARLES ROHALEY, II * * * Cleveland, Ohio
* * * * * Debtor. * * * March 2, 2017
* * * * *

TRANSCRIPT OF PROCEEDINGS
HELD BEFORE THE TRUSTEE DAVID O. SIMON

APPEARANCES:

GLENN E. FORBES, ESQ.
For the Debtor

CHAD M. LEONARD

LISA D. SUMMERS, ESQ.

Transcribed by:

Legal Electronic Recording, Inc.
5230 St. Clair Avenue
Cleveland, Ohio 44103
(216) 881-8000 Fax 881-DEPO (3376)

Proceeding recorded by electronic sound recording,
transcript produced by transcription service.
Job No. 17E4057

LEGAL ELECTRONIC RECORDING, INC. 216-881-8000

Sworn to and personally appeared before *John B. Devorsky* on this 17th day of
August 2017.

John B. Devorsky
Commission expires: Feb. 13, 2022



EXHIBIT 3

4

1 Q Any dependents?
2 A No.
3 Q Are you employed?
4 A No.
5 Q All right. How long you been out of work?
6 A October 28, 2016.
7 Q Okay. Does your wife work?
8 A Yes.
9 Q And where does she work?
10 A America's Best Opticians. She's a licensed
11 optician.
12 Q How often is she paid, do you know?
13 A Bi-weekly.
14 Q Approximately how much she brings home in a
15 paycheck, do you know?
16 A Approximately --
17 Q Round number, ballpark.
18 A It varies between 750-900.
19 Q Okay. Any other sources of income in the
20 household?
21 A At this time, no.
22 Q All right. Have you been in bankruptcy in the
23 past 10 years?
24 A No.
25 Q What caused you to file this bankruptcy?

Sworn to and personally appeared before me on this 17th day of
August 2017.
Yuli B Devorsky
Commission expire: Feb. 13, 2022



LEGAL ELECTRONIC RECORDING, INC. 216-381-5000

EXHIBIT 3

13

1 A No.

2 Q Do you own any stocks or bonds or other
3 securities?

4 A No.

5 Q Do you have any interest in an entity called the
6 Rohaley Family Trust?

7 A Correct.

8 Q What is that?

9 A That is --

10 Q I mean, I know it's a trust, but what --

11 A It's a trust. It's my father's house.

12 Q Okay. And what is your interest, if you know?

13 A When the house is sold, my -- whatever we sell it
14 for, 20 percent is supposed to come to me.

15 Q Okay. And who's we?

16 A My two sisters and myself.

17 Q Okay. So the three of you have interest in the
18 house now?

19 A Correct.

20 Q Is your father still with us?

21 A No, he passed away two and a half years ago.

22 Q So is that what the trust provides, that once he
23 passes away, the three of you sell it?

24 A Yes.

25 Q And is the house on the market?

Sworn to and personally appeared before ~~Notary Public~~ on the ~~15th~~ day of
August 2019.
John B. Devorsky
Commission expires: Feb. 13, 2022



EXHIBIT 3

19

1 deal on a buyout.

2 Q Okay.

3 A And, unfortunately, it went in front of Judge
4 Collins and Judge Collins basically said that if we
5 can't come to a conclusion of what we're going to do
6 with the business and a direction that we're going to
7 go, then he would appoint a receiver and the receiver
8 would take over the business and we're out.

9 Q Okay. Was a receiver appointed?

10 A No, he never appointed a receiver.

11 Q Okay. But the business closed down?

12 A I closed it.

13 Q Why did you close it?

14 A Because, one, I couldn't wait for him to appoint a
15 receiver.

16 Q Okay.

17 A All right. And number two, I just couldn't run
18 the business anymore.

19 Q Okay. What's there? What is there at the
20 physical location of Rohaley & Son?

21 A A lot of equipment.

22 Q Okay.

23 A You want a list?

24 Q I'm sure you have one. No, I'm not going to write
25 it down. You're going to write it down and give it



Sworn to and personally appeared before me on the 11th day of
August 2017. John B. Devorsky
Commission Expires: Feb. 13, 2022

EXHIBIT 4

TRANSCRIPT OF PROCEEDINGS

13 BE IT REMEMBERED, that heretofore, to-wit:
14 On Wednesday, November 16, 2016, being one of the regu-
15 days of said Court, before the Honorable Richard L.
16 Collins, Jr., one of the Judges of said Court, the
17 above-entitled cause came on for purposes of
18 a show cause hearing.

Luanne M. Peairs, Official Court Reporter
Lake County Courthouse
Painesville, OH 44077
(440)350-2720

Sworn to and personally appeared before on the 13th day of
August 2017.
Paul B. Deversky
Commission expires Feb. 13, 2022



EXHIBIT 4

56

1 Q. And clearly says she represents both you and Rohaley &
2 Son Automotive?
3 A. Correct.
4 Q. So, the sign you put up basically said the location
5 moved across the street?
6 A. We moved.
7 Q. Was anything taken from the shop in that move?
8 A. Just the technicians tools.
9 Q. So, there were things removed from the location?
10 A. We can't keep the guys from not working and they own
11 their tools and their toolboxes.
12 Q. Ballpark, how much was taken out of the store?
13 A. I can't tell you that. I don't know.
14 Q. Were you there?
15 A. No.
16 Q. Were you watching them while they were taking things?
17 A. I can't tell you that, I don't know. I wasn't there.
18 Q. Do any of those employees work for you now?
19 A. Yes, they all do.
20 Q. All work at the new location?
21 A. Yes.
22 Q. Your testimony as you sit here today is they removed
23 things, you don't know what it is, but they took things
24 out of the store?
25 A. They took their tools that they had there. They took

Luanne M. Pears, Official Court Reporter
Lake County Courthouse
Painesville, OH 44077
(440)350-2720



Sworn to and personally appeared before on this 17th day of
August 2017. John B. Devorsky
Commission Expires: Feb. 13, 2022

Exhibit 5

CONDITION OF ROMALEY AND SON AUTOMOTIVE
2624 TWINBROOK ROAD
MENTOR, OHIO 44060
JANUARY 3, 2017

Howard Bodner Frank L. Walter James P. Boen
PRINTED NAME SIGNATURE TITLE/CAPACITY

Erik L. Walter Frank L. Walter Layton
PRINTED NAME SIGNATURE TITLE/CAPACITY

Eric Leonard Howard Boen Executive Vice President
PRINTED NAME SIGNATURE TITLE/CAPACITY

Chad M. Leiball John B. Devorsky Owner
PRINTED NAME SIGNATURE TITLE/CAPACITY

PRINTED NAME SIGNATURE TITLE/CAPACITY

PRINTED NAME SIGNATURE TITLE/CAPACITY

PRINTED NAME SIGNATURE TITLE/CAPACITY

1/1

John B. Devorsky

Sworn to and personally appeared before me on this 17th day of August 2017.

John B. Devorsky

Commission expires: Feb. 13, 2022



EXHIBIT 6**APRIL 25, 27, 28, & May 2, 2017**

NAME	STREET ADDRESS	CITY	STATE	ZIP	RELATIONSHIP
CHAD M. LEONARD	7481 BRENEL DR	MENTOR	OH		44060 OWNER
GALE LEONARD STANNERY	7481 BRENEL DR.	MENTOR	OH		44060 HOLDINGS CO SECRETARY
JESSICA THOMAS	107 JOHNSON AVE.	CUYAHOGA FALLS	OH		44221 WORKERS
KIM AGNEW	1237 HUNTERS LAKE E	CUYAHOGA FALLS	OH		44221 WORKERS
MELISSA LARKIN	1007 BROADWAY E	CUYAHOGA FALLS	OH		44221 WORKERS
JESSICA PILZI	7500 BRENEL DR.	MENTOR	OH		44060 WORKERS
VINCENT GIGLIOTTI	9180 WILLIAMS RD.	CHARDON	OH		44024 WORKERS
JOE GIGLIOTTI	9171 WILLIAMS RD	CHARDON	OH		44024 WORKERS
SHIRLEY CERIAN	6815 FIRESIDE CT.	MENTOR	OH		44060 WORKERS
PAULA USKO	334 W. PARKWAY DR.	MADISON	OH		44057 WORKERS
ROBERT HEETER (Dad)	5529 REEF RD	MENTOR ON THE LAKE	OH		44060 CONTRACTOR
MIKE RASH	6431 MOPICINS RD	MENTOR	OH		44060 CONTRACTOR
KYLE HEETER	5754 BIRCHWOOD RD.	MENTOR	OH		44060 CONTRACTOR
CAC SCRAP IRON & SON	11529 KELTON	CLEVELAND	OH		44106 CONTRACTOR
ANTONIO CRAWFORD	1793 GREEN RD	MADISON	OH		44057 WORKERS
SHANE GILES	8648 TYLER BLVD.	MENTOR ON THE LAKE	OH		44060 WORKERS
ERIC WALTER	605 PARKPLACE	PAINESVILLE	OH		44060 ATTORNEY
CHRIS RESHICE	8500 CIVIC CENTER BLVD	MENTOR	OH		44060 BAILIFF
MIKE LEVAN (LANDLORD)	808 E. 70TH ST	CLEVELAND	OH		44103 DAVIE DEE CORP.
CADEN USKO	334 W. PARKWAY DR.	MADISON	OH		44057 WORKERS


 Sworn to and personally appeared before me, on this 17th day
 of August 2017.

 Commission expires: Feb. 13, 2022



RSA SNAP ON PAYMENTS

2014 - 10/2016

Snap On Credit	Alignment Machine	Balance & Tire Machine			Snap On Kurt	SNAP ON CASH SALES			
Posting Date	Check No.	Amt. Paid	Posting Date	Check No.	Amt. Paid	Posting Date	Check No.	Amt. Paid	Cash Amt.
2014									
*	CML	1984.06				1/27/2014	1020	700.00	
4/28/2014	1165	992.03				2/3/2014	1036	1000.00	
5/30/2014	1230	992.03				2/24/2014	1065	700.00	
6/23/2014	1261	992.03				3/31/2014	1107	700.00	
7/29/2014	1328	992.03				4/21/2014	1159	700.00	
9/2/2014	1378	992.03				5/27/2014	1221	1000.00	
9/25/2014	1424	992.03				6/30/2014	1272	1000.00	
10/31/2014	1498	2395.92				7/28/2014	1321	1000.00	
12/4/2014	1574	992.03				8/25/2014	1369	1200.00	
						9/29/2014	1431	2650.00	
						10/20/2014	1471	1200.00	
						11/24/2014	1552	1200.00	
						12/22/2014	1602	1200.00	
2015									
1/6/2015	1613	992.03	4/2/2015	1790	1197.96	1/26/2015	1688	1200.00	
1/20/2015	1658	992.03	5/1/2015	1845	1197.96	2/2/2015	1679	450.00	
4/2/2015	1792	992.03	6/1/2015	1894	1197.96	2/23/2015	1712	1350.00	
5/1/2015	1844	992.03	6/30/2015	1946	1197.96	3/23/2015	1777	1200.00	
6/1/2015	1893	992.03	8/3/2015	1996	1197.96	4/20/2015	1826	1200.00	
6/30/2015	1945	992.03	8/31/2015	2052	1197.96	5/26/2015	1885	1200.00	
8/31/2015	2051	992.03	10/5/2015	1037	1197.96	6/22/2015	1931	1200.00	
11/3/2015	1083	992.03	11/5/2015	1085	1197.96	7/20/2015	1988	1200.00	
12/7/2015	1125	992.03	12/7/2015	1124	1197.96	9/5/2015	1036	1000.00	
12/29/2015	1156	992.03				10/26/2015	1078	1200.00	
						11/23/2015	1111	1200.00	
						12/28/2015	1162	1260.00	
2016									
2/8/2016	1206	992.03				1/26/2016	1200	1300.00	
2/29/2016	1232	992.03				2/22/2016	1227	1500.00	
4/1/2016	1282	992.03				3/21/2016	1274	1300.00	
5/3/2016	1332	992.03				4/18/2016	1308	1300.00	
5/27/2016	1373	992.03				5/31/2016	1378	1300.00	
6/21/2016	1403	992.03				6/27/2016	1418	1300.00	
7/22/2016	1459	992.03				7/25/2016	1472	1300.00	
8/16/2016	1482	992.03				8/22/2016	1514	1300.00	
10/19/2016	1599	992.03				9/26/2016	1572	1300.00	
10/19/2016	1600	992.03				10/24/2016	1627	701.76	
Paid in Full					\$ 31,164.79	\$ 10,781.64	\$ 40,511.76	Total	\$ 82,458.19



Sworn to and personally appeared on this 17th day of August 2017.



Commission expires: Feb. 13, 2022

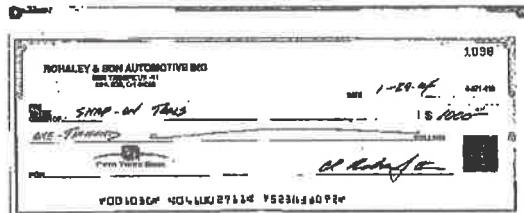


Checks 2014 Tools



Posting Date 2014 Jan 27 Posting Check Number
1020 Amount \$700.00

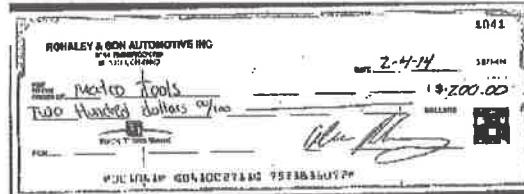
1020 10410029114 76230330748
501011701



Posting Date 2014 Feb 03 Posting Check Number
1036 Amount \$1,000.00

Posting Date 2014 Jan 27 Posting Check Number
1020 Amount \$700.00

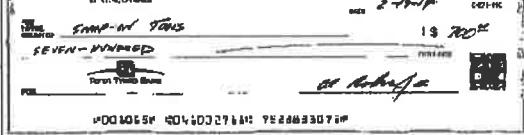
1020 10410029114 76230330748
501011701



Posting Date 2014 Feb 10 Posting Check Number
1041 Amount \$200.00

Posting Date 2014 Feb 03 Posting Check Number
1036 Amount \$1,000.00

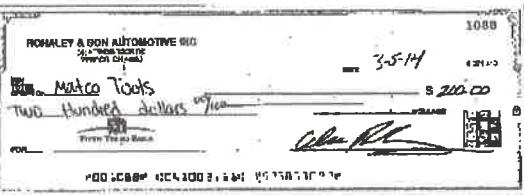
1036 10410027114 76230330748
501011701



Posting Date 2014 Feb 24 Posting Check Number
1065 Amount \$700.00

Posting Date 2014 Feb 10 Posting Check Number
1041 Amount \$200.00

1041 10410029114 76230330748
501011701



Posting Date 2014 Mar 10 Posting Check Number
1088 Amount \$200.00

Posting Date 2014 Feb 24 Posting Check Number
1065 Amount \$700.00

1065 10410029114 76230330748
501011701

Posting Date 2014 Mar 10 Posting Check Number
1088 Amount \$200.00

1088 10410029114 76230330748
501011701

Sworn to and personally appeared before ~~on this~~ ^{17th} day
August 2017.
Gwen B Devansky
Commission expires: Feb. 13, 2022



Checks 2014 Tools

ROHALEY & BON AUTOMOTIVE INC		1107
801 TROPICAL RD		
MIAMI, FL 33148		
IN THE SNAP-IN TIRE		3-25-74
STUDY: HAVING		\$ 700
TICK, TICK, TICK		TIMELESS
PER		<i>o R. B. Jr.</i>
00000000000000000000000000000000		

Posting Date 2014 Mar 31 Posting Check Number
1107 Amount \$700.00

SEARCHED INDEXED SERIALIZED FILED
FEB 19 1968 10:00 AM '68
FBI - MEMPHIS
65-11111-59

Posting Date 2014 Mar 31 Posting Check Number
1107 Amount \$700.00

ROHALEY & SON AUTOMOTIVE INC		1127
10111 100th Street		DETROIT, MI 48235
4/13/97		407-442
ITEM	DESCRIPTION	QUANTITY
1	1996 FORD F150	1
TOTAL AMOUNT		\$ 800.00
DOWN PAYMENT		\$ 0.00
BALANCE		\$ 800.00
TERMS		12 MONTHS
SIGNATURE		04/13/97
FOR	John Rohaley	
WFO1127-100100-407 407-442 407-442 407-442		

Posting Date 2014 Apr 07 Posting Check Number
1127 Amount \$200.00

Posting Date 2014 Apr 07 Posting Check Number
1127 Amount \$200.00

ROMALY & BORN AUTOMOTIVE INC 1000 BORN ST. DETROIT, MI 48201		1177
4-28-19		4-28-19
USA TOOLS		IS 500.00
Five Hundred Dollars		00/00
FEB 1994		CELESTE
FEB 1994		CELESTE
0001194 004002814 9523830 725		

Posting Date 2014 Apr 30 Posting Check Number

04/10/2014 07:00 1025426

Posting Date 2014 Apr 21 Posting Check Number
1159 Amount \$700.00

Posting Date 2014 Apr 28 Posting Check Number
1165 Amount \$992.03

Posting Date 2014 Apr 21 Posting Check Number
1159 Amount \$700.00

Posting Date 2014 Apr 28 Posting Check Number
1165 Amount \$992.03

Sworn to and personally appeared before
of August 2017.

Joni B Devorsky
Commission expires: Feb. 13, 2022

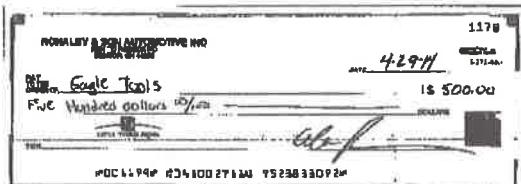


The seal is circular with a decorative border. The outer ring contains the text "NOTARY PUBLIC", "OHIO", "JONI B DEVORSKY", and "17th". The inner circle features a landscape illustration with a sun, water, and trees, surrounded by the text "STATE OF OHIO" and "CMM EXP: FEB 13 2022".

Opissi B Devoristy
commission expires: Feb. 13, 2022



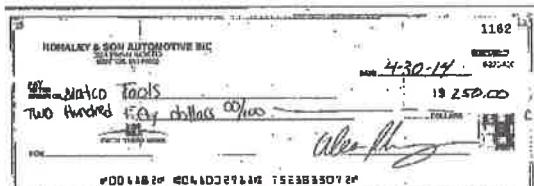
Checks 2014 Tools



Posting Date 2014 May 05 Posting Check Number
1179 Amount \$500.00



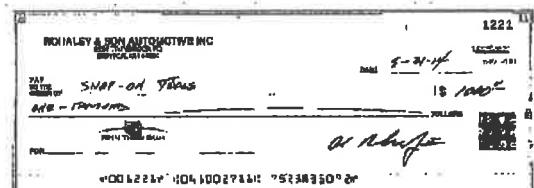
Posting Date 2014 May 05 Posting Check Number
1179 Amount \$500.00



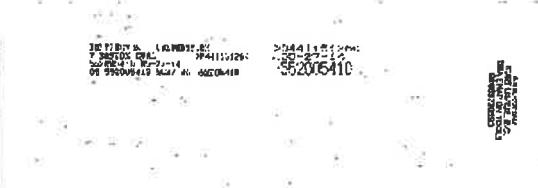
Posting Date 2014 May 05 Posting Check Number
1182 Amount \$250.00



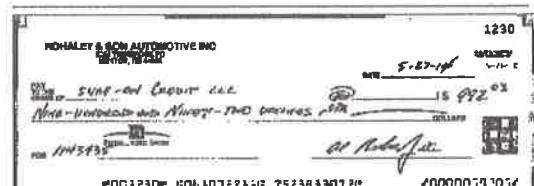
Posting Date 2014 May 05 Posting Check Number
1182 Amount \$250.00



Posting Date 2014 May 27 Posting Check Number
1221 Amount \$1,000.00



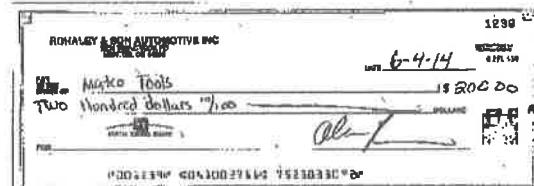
Posting Date 2014 May 27 Posting Check Number
1221 Amount \$1,000.00



Posting Date 2014 May 30 Posting Check Number
1230 Amount \$992.03



Posting Date 2014 May 30 Posting Check Number
1230 Amount \$992.03



Posting Date 2014 Jun 09 Posting Check Number
1239 Amount \$200.00



Posting Date 2014 Jun 09 Posting Check Number
1239 Amount \$200.00

Sworn to and personally appeared before on this 17th day of
August 2017.

John B Devorsky

Commission expires: Feb. 13, 2022



Checks 2014 Tools

Posting Date 2014 Jun 23 Posting Check Number
1261 Amount \$992.03

Posting Date 2014 Jun 30 Posting Check Number
1272 Amount \$1,000.00

ROHALEY & CO. AUTOMOTIVE INC		1279
1000 E. 10TH ST. KNOXVILLE, TN 37902		6-26-14
DAY TIME	USA 7003	15 100 ft
DATE	APR 10 2014	WHEELS
RECEIVED ROHALEY & CO. AUTOMOTIVE INC		06
1000 E. 10TH ST. KNOXVILLE, TN 37902		06

Posting Date 2014 Jul 02 Posting Check Number
1279 Amount \$100.00

**Posting Date 2014 Jul 29 Posting Check Number
1328 Amount \$992.03**

IVORYALEY & SON AUTOMOTIVE INC.		1321
1017 FREDERIC ST. EDMONTON, ALBERTA		
NAME Mr. W. H. Ivoryaley	3000-401-7003	DATE 7-28-74
STREET 1017 FREDERIC		AMOUNT \$1,000.00
PHONE 446-1234		TERMS BALANCE
FOR Terry Truck Sales		<i>W. Ivoryaley</i>
2117 FREDERIC ST. 1017 FREDERIC 401-7003		

Posting Date 2014 Jul 28 Posting Check Number
1321 Amount \$1,000.00

Posting Date 2014 Jun 23 Posting Check Number
1261 Amount \$992.03

ATTORNEY'S FEES CALIFORNIA 94
104-18144
104-17708-00 104-18144
104-17738 104-18144
104-18144

Posting Date 2014 Jun 30 Posting Check Number
1272 Amount \$1,000.00

Posting Date 2014 Jul 02 Posting Check Number
1279 Amount \$100.00

**Posting Date 2014 Jul 29 Posting Check Number
1328 Amount \$992.03**

Posting Date 2014 Jul 28 Posting Check Number
1321 Amount \$1,000.00

Sworn to and personally appeared before me, on this 17th day
of August 2017.

Gopi B Devorshy

Commission expires: Feb. 13, 2022



Checks 2014 Tools

Posting Date 2014 Aug 25 Posting Check Number
1369 Amount \$1,200.00

ROMALEY & SON AUTOMOTIVE INC		1378
5511 PINEHURST AVE. CARMEL, IN 46032		RECEIVED 8/16/96 8:31:2
 <i>Frank M. Clegg</i> Nine-hundred and Ninety-two dollars & 99¢ 		3 99 ⁹⁹ DOLLARS
FOR	 000015769 00410027614 78180339724 00000442034	

Posting Date 2014 Sep 02 Posting Check Number
1378 Amount \$992.03

ROQUELY & SON AUTOMOTIVE INC		1387
201 HARRISON ST. WHITEPLAINS, NY 10601		
DATE 7-3-94		
TYPE CODE	AM-100	TIME 5:20PM
- Fuel - Maintenance		VEHICLE
FOR	e. belmont	
00013812 0041002710 7523833678		

Posting Date 2014 Sep 08 Posting Check Number
1387 Amount \$200.00

Posting Date 2014 Sep 25 Posting Check Number
1424 Amount \$992.03

RONALD J. & SON AUTOMOTIVE INC		1431
1011 S. 100 E. #200		INDIANAPOLIS
DETROIT 04-4800		IN 46216
REF. NO. Snap-on		6-24-14
TWO Thousand Six hundred Fifty dollars 00/100		2,650.00
CASH		CHARGE
FEB. 24, 1964		Al R. Flory
PCB 14316 8041002944 7528833072		

Posting Date 2014 Sep 29 Posting Check Number
1431 Amount \$2,650.00

20140825009403809762

Posting Date 2014 Aug 25 Posting Check Number
1369 Amount \$1,200.00

Posting Date 2014 Sep 02 Posting Check Number
1378 Amount \$992.03

2025 RELEASE UNDER E.O. 14176

Posting Date 2014 Sep 08 Posting Check Number
1387 Amount \$200.00

Posting Date 2014 Sep 25 Posting Check Number
1424 Amount \$992.03

20140929009402780869

Posting Date 2014 Sep 29 Posting Check Number
1431 Amount \$2,650.00

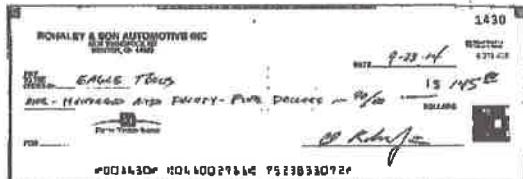
Sworn to and personally appeared before on this 17th day of
August 2017.

Yuri B Devarsity

Commission expires: Feb.13,2022



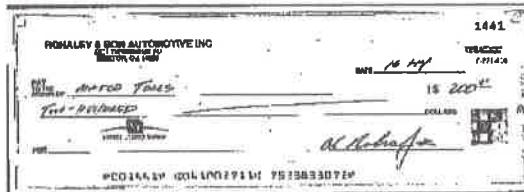
Checks 2014 Tools



Posting Date 2014 Sep 29 Posting Check Number
1430 Amount \$145.90



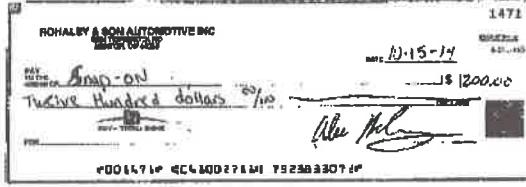
Posting Date 2014 Sep 29 Posting Check Number
1430 Amount \$145.90



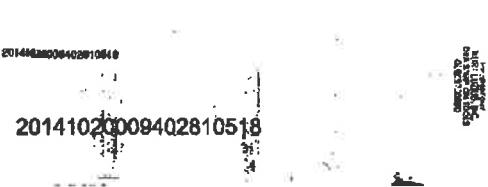
Posting Date 2014 Oct 06 Posting Check Number
1441 Amount \$200.00



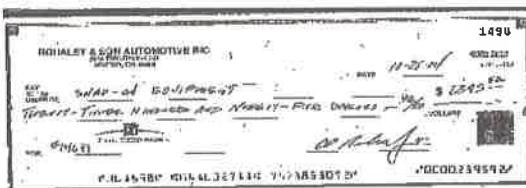
Posting Date 2014 Oct 06 Posting Check Number
1441 Amount \$200.00



Posting Date 2014 Oct 20 Posting Check Number
1471 Amount \$1,200.00



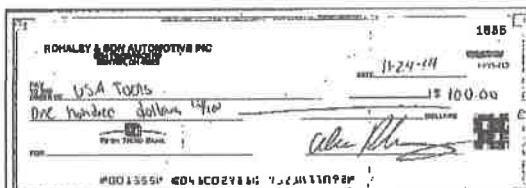
Posting Date 2014 Oct 20 Posting Check Number
1471 Amount \$1,200.00



Posting Date 2014 Oct 31 Posting Check Number
1498 Amount \$2,395.92



Posting Date 2014 Oct 31 Posting Check Number
1498 Amount \$2,395.92



Posting Date 2014 Nov 26 Posting Check Number
1555 Amount \$100.00



Posting Date 2014 Nov 26 Posting Check Number
1555 Amount \$100.00

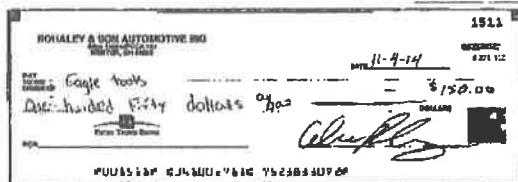
Sworn to and personally appeared before me on this 17th day of August 2017.

John B Devorsky

Commission expires: Feb. 13, 2022



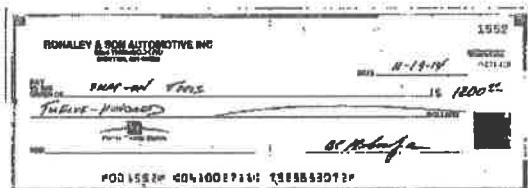
Checks 2014 Tools



Posting Date 2014 Nov 10 Posting Check Number
1511 Amount \$150.00



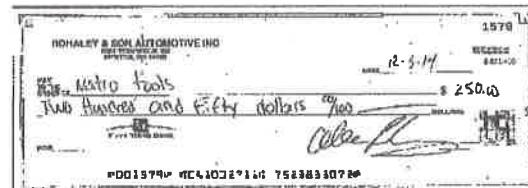
Posting Date 2014 Nov 10 Posting Check Number
1511 Amount \$150.00



Posting Date 2014 Nov 24 Posting Check Number
1552 Amount \$1,200.00



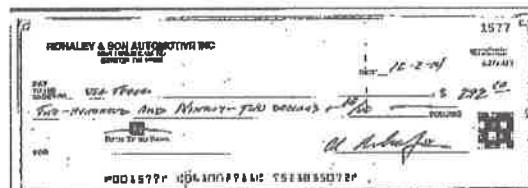
Posting Date 2014 Nov 24 Posting Check Number
1552 Amount \$1,200.00



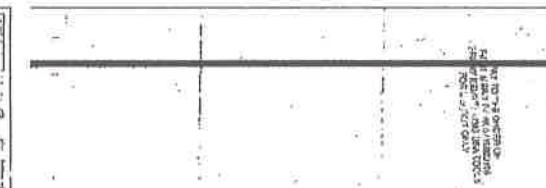
Posting Date 2014 Dec 08 Posting Check Number
1579 Amount \$250.00



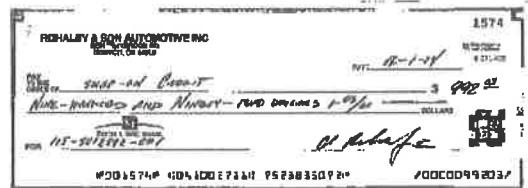
Posting Date 2014 Dec 08 Posting Check Number
1579 Amount \$250.00



Posting Date 2014 Dec 03 Posting Check Number
1577 Amount \$292.60



Posting Date 2014 Dec 03 Posting Check Number
1577 Amount \$292.60



Posting Date 2014 Dec 04 Posting Check Number
1574 Amount \$992.03



Posting Date 2014 Dec 04 Posting Check Number
1574 Amount \$992.03

Sworn to and personally appeared before me on this 17th day of August
2017.

John B. Devorsky

Commission expires: Feb. 13, 2022



Checks 2014 Tools



Posting Date 2014 Dec 22 Posting Check Number
1602 Amount \$1,200.00

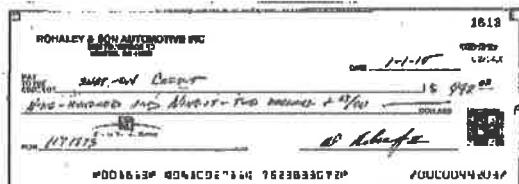
Posting Date 2014 Dec 22 Posting Check Number
1602 Amount \$1,200.00

Sworn to and personally appeared before on this 17th day of August 2019.
Jonni B. Devorsky

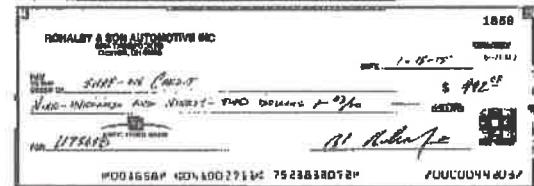
Commission expires: Feb. 13, 2022



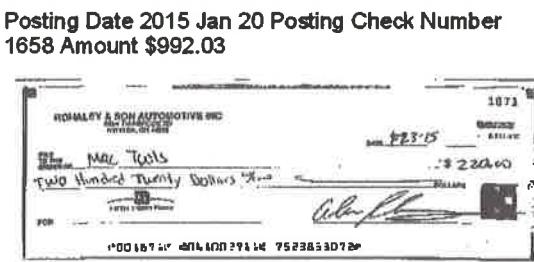
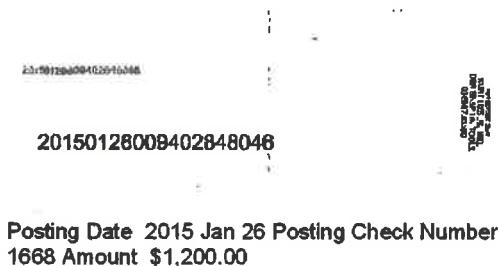
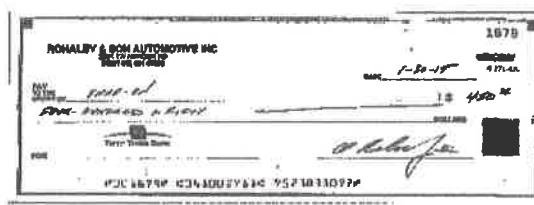
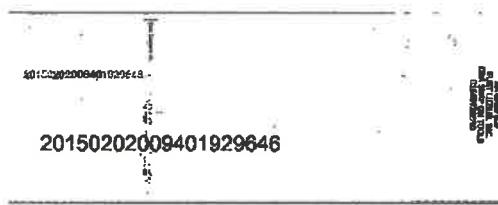
#3072 2015 TOOL CO CHECKS

Posting Date 2015 Jan 06 Posting Check Number
1613 Amount \$992.03

APPROVING/REVIEWER SIGN	CR TO HOD
070000	070000000000
10000000	00000000
00000000	00000000000000

Posting Date 2015 Jan 20 Posting Check Number
1658 Amount \$992.03

APPROVING/REVIEWER SIGN	CR TO HOD
070000	070000000000
10000000	00000000
00000000	00000000000000

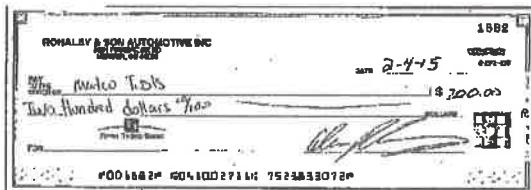
Posting Date 2015 Jan 26 Posting Check Number
1671 Amount \$220.00Posting Date 2015 Jan 06 Posting Check Number
1613 Amount \$992.03Posting Date 2015 Jan 20 Posting Check Number
1658 Amount \$992.03Posting Date 2015 Jan 26 Posting Check Number
1671 Amount \$220.00Posting Date 2015 Jan 26 Posting Check Number
1668 Amount \$1,200.00Posting Date 2015 Jan 26 Posting Check Number
1668 Amount \$1,200.00Posting Date 2015 Feb 02 Posting Check Number
1679 Amount \$450.00Posting Date 2015 Feb 02 Posting Check Number
1679 Amount \$450.00

John B. Devorsky
Sworn to and personally appeared before me on this 17th day of August 2017.
John B. Devorsky

Commission expires: Feb. 13, 2022



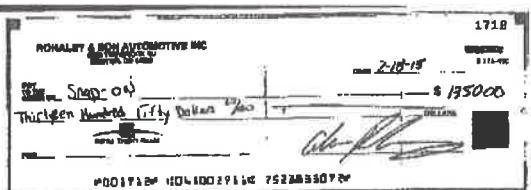
#3072 2015 TOOL CO CHECKS



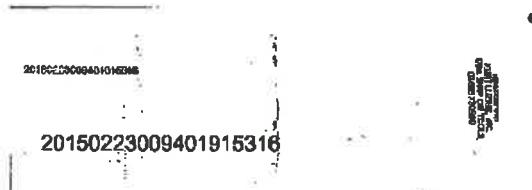
Posting Date 2015 Feb 10 Posting Check Number
1682 Amount \$200.00



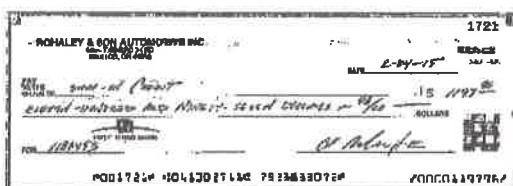
Posting Date 2015 Feb 10 Posting Check Number
1682 Amount \$200.00



Posting Date 2015 Feb 23 Posting Check Number
1712 Amount \$1,350.00



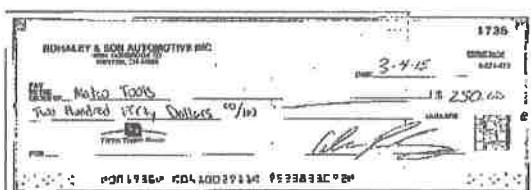
Posting Date 2015 Feb 23 Posting Check Number
1712 Amount \$1,350.00



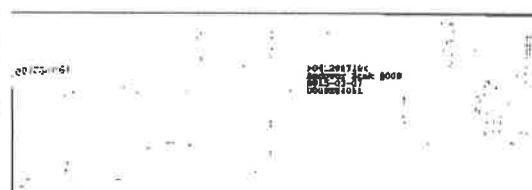
Posting Date 2015 Feb 27 Posting Check Number
1721 Amount \$1,197.96



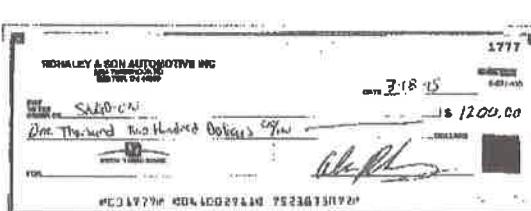
Posting Date 2015 Feb 27 Posting Check Number
1721 Amount \$1,197.96



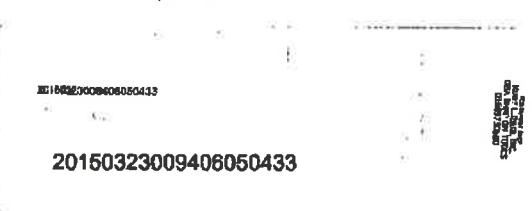
Posting Date 2015 Mar 11 Posting Check Number
1736 Amount \$250.00



Posting Date 2015 Mar 11 Posting Check Number
1736 Amount \$250.00



Posting Date 2015 Mar 23 Posting Check Number
1777 Amount \$1,200.00



Posting Date 2015 Mar 23 Posting Check Number
1777 Amount \$1,200.00

John B. Devorsky

Sworn to and personally appeared before on this 17th day of August 2017
John B. Devorsky

Commission expires: Feb. 13, 2022



#3072 2015 TOOL CO CHECKS

Posting Date 2015 Apr 02 Posting Check Number
1790 Amount \$1,197.96

ROMALEY & SON AUTOMOTIVE INC		1792
1000 BROADWAY RD MOUNTAIN View, CA 94031		REGISTRATION 607-411
DATE	SNAP-ON LEXUS	8-30-15
SERVICE	SIX HUNDRED AND NINETY-THREE	13 916.23
FOR	11143845	<i>08/08/15</i>
1000 BROADWAY RD MOUNTAIN View, CA 94031		00000101 1014

Posting Date 2015 Apr 02 Posting Check Number
1792 Amount \$992.03

Posting Date 2015 Apr 20 Posting Check Number
1826 Amount \$1,200.00

Posting Date 2015 May 01 Posting Check Number
1845 Amount \$1,197.96

Posting Date 2015 May 01 Posting Check Number
1844 Amount \$992.03

Posting Date 2015 Apr 02 Posting Check Number
1790 Amount \$1,197.96

J. P. MORSE & SONS, INC. 601 TIG HILL
1900-1910 1900-1910 1900-1910
1900-1910 1900-1910 1900-1910

Posting Date 2015 Apr 02 Posting Check Number
1792 Amount \$992.03

20150420009405026539

Posting Date 2015 Apr 20 Posting Check Number
1826 Amount \$1,200.00

AMINOACIDIC RESIDUE
Glycine 12 Methionine 14 Tyrosine 16
Alanine 20 Asparagine 27 Glutamic acid 39
Serine 134 Glutamine 141 Alanine 151

Posting Date 2015 May 01 Posting Check Number
1845 Amount \$1,197.96

1/19/2015 10:57:25 AM 00000000000000000000000000000000

Posting Date 2015 May 01 Posting Check Number
1844 Amount \$992.03

Commission expires: Feb. 13, 2022



#3072 2015 TOOL CO CHECKS

RONALDY & SON AUTOMOTIVE INC		1085
1000 1/2 10th Street Winnipeg, Manitoba		
TELE: 232-1222		
FAX: 232-1222		
S/N: 100-1234567890		5-20-1992
DATE: 10/10/92		15/10/92
TIME: 10:00 AM		
TO: 1000 1/2 10th Street		
FROM: 1000 1/2 10th Street		
RE: 1000 1/2 10th Street		
AMOUNT: \$100.00		
METHOD: CASH		
REMARKS: <i>Reb</i>		

Posting Date 2015 May 26 Posting Check Number
1885 Amount \$1,200.00

Posting Date 2015 Jun 01 Posting Check Number
1894 Amount \$1,197.96

Posting Date 2015 Jun 01 Posting Check Number
1893 Amount \$992.03

Posting Date 2015 Jun 22 Posting Check Number
1931 Amount \$1,200.00

Posting Date 2015 Jun 30 Posting Check Number
1945 Amount \$992.03

20150526009403810422

Posting Date 2015 May 26 Posting Check Number
1885 Amount \$1,200.00

Posting Date 2015 Jun 01 Posting Check Number
1894 Amount \$1,197.96

Posting Date 2015 Jun 01 Posting Check Number
1893 Amount \$992.03

20150622009401901702

Posting Date 2015 Jun 22 Posting Check Number
1931 Amount \$1,200.00

Posting Date 2015 Jun 30 Posting Check Number
1945 Amount \$992.03

1040 Amount \$82.00
1040 Amount \$82.00
John B. Devorsky
Sworn to and personally appeared before on this 17th day of August 2017.
John B. Devorsky
John B. Devorsky NOTARY PUBLIC

Commission expires: Feb. 13, 2022



#3072 2015 TOOL CO CHECKS

ROMALLEY & SCHAFFNER CO., INC.		PERMIT NO. 100	4/16/66
GENERAL CONTRACTORS		6-10-107	
PER	TYPE	JOHN - AT CEDAR	\$ 1167.00
BUREAU NUMBERED AND INDEXED - SEVEN ENTRIES		100	100
SEARCHED INDEXED SERIALIZED FILED		SEARCHED INDEXED SERIALIZED FILED	
FBI - MEMPHIS		4/16/66	
115487		SEARCHED INDEXED SERIALIZED FILED	
FBI - MEMPHIS			

Posting Date 2015 Jun 30 Posting Check Number
1946 Amount \$1,197.96

1999-01-01 1999-01-01 1999-01-01
1999-01-01 1999-01-01 1999-01-01
1999-01-01 1999-01-01 1999-01-01

Posting Date 2015 Jun 30 Posting Check Number
1946 Amount \$1,197.96

Posting Date 2015 Jul 06 Posting Check Number
1953 Amount \$200.00

MONAHAY & SON AUTOMOTIVE INC		1988
CENTRAL, OHIO 44024		7-17-85
DAY	SHAD-ED' TOOLS	AMOUNT
TIME	10:00 A.M.	\$ 100.00
TERMS - NET 30		DATE PAID
PREVIOUS BALANCE		0
TOTAL		0
CASH		0
CREDIT		0
DEBIT		0
BALANCE		0

Posting Date 2015 Jul 06 Posting Check Number
1953 Amount \$200.00

Posting Date 2015 Jul 20 Posting Check Number
1988 Amount \$1,200.00

Posting Date 2015 Jul 20 Posting Check Number
1988 Amount \$1,200.00

Posting Date 2015 Aug 03 Posting Check Number
1996 Amount \$1,197.96

Posting Date 2015 Aug 03 Posting Check Number
1996 Amount \$1,197.96

Posting Date 2015 Aug 10 Posting Check Number
2012 Amount \$200.00

Posting Date 2015 Aug 10 Posting Check Number
2012 Amount \$200.00

Sworn to and personally appeared before me on the 19th day of August
2017
JONNI B DEVORSKY
Commission expires: Feb 13 2022

#3072 2015 TOOL CO CHECKS

Posting Date 2015 Aug 31 Posting Check Number
2051 Amount \$992.03

Posting Date 2015 Aug 31 Posting Check Number
2052 Amount \$1,197.96

Posting Date 2015 Aug 31 Posting Check Number
2051 Amount \$992.03

Posting Date 2015 Aug 31 Posting Check Number
2052 Amount \$1,197.96

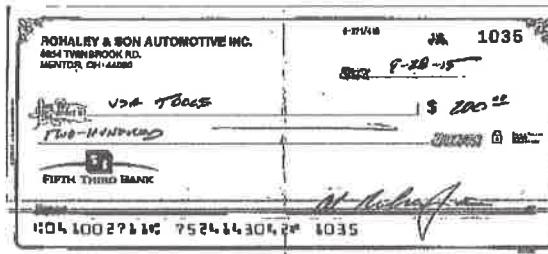
Carl H. J.
Sworn to and personally appeared before on this 17th day of
August 2017.

John B. Devorsky

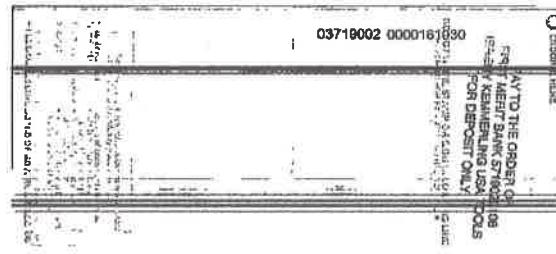
Commission expires: Feb. 13, 2022



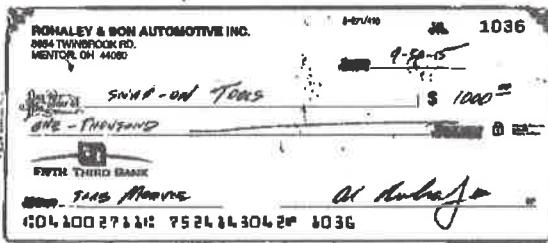
#3042 2015 TOOL CO CHECKS



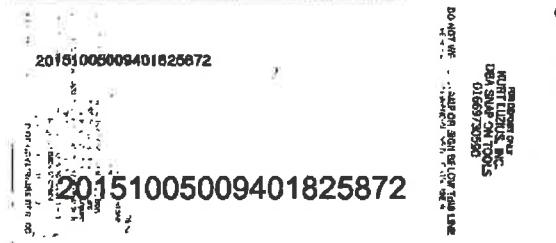
Posting Date 2015 Oct 01 Posting Check Number
1035 Amount \$200.00



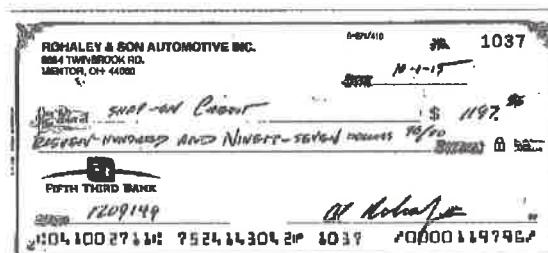
Posting Date 2015 Oct 01 Posting Check Number
1035 Amount \$200.00



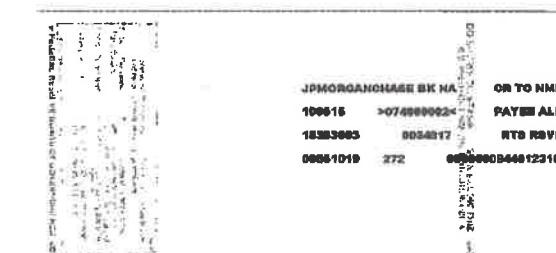
Posting Date 2015 Oct 05 Posting Check Number
1036 Amount \$1,000.00



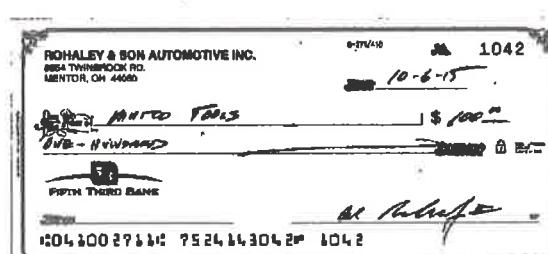
Posting Date 2015 Oct 05 Posting Check Number
1036 Amount \$1,000.00



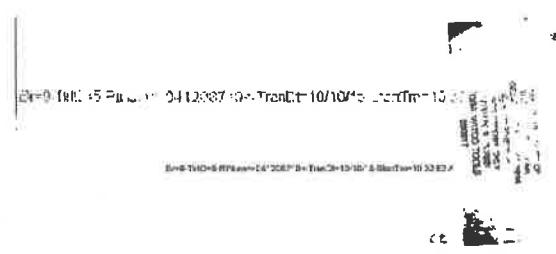
Posting Date 2015 Oct 05 Posting Check Number
1037 Amount \$1,197.96



Posting Date 2015 Oct 05 Posting Check Number
1037 Amount \$1,197.96



Posting Date 2015 Oct 13 Posting Check Number
1042 Amount \$100.00



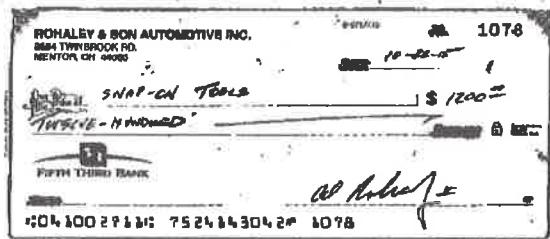
Posting Date 2015 Oct 13 Posting Check Number
1042 Amount \$100.00

Aug 17 2017

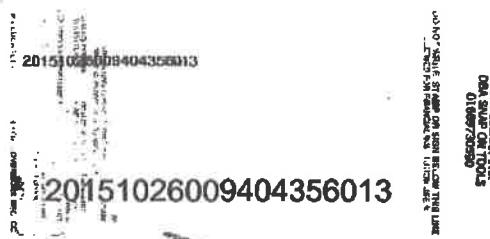
Sworn to and personally appeared before me on this 17th day of August 2017.
JILL B. DEVORSKY
Commission expires: Feb. 13, 2022



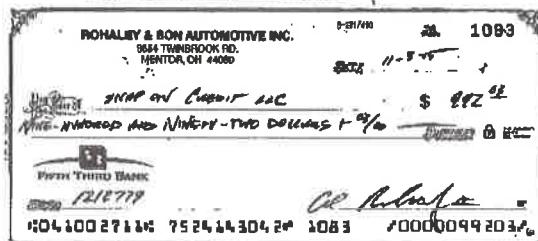
#3042 2015 TOOL CO CHECKS



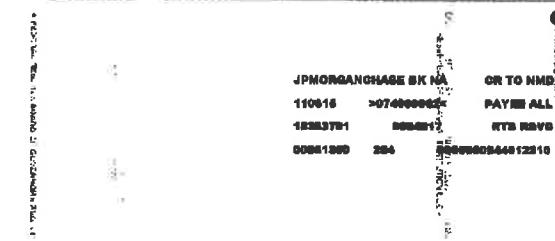
Posting Date 2015 Oct 26 Posting Check Number
1078 Amount \$1,200.00



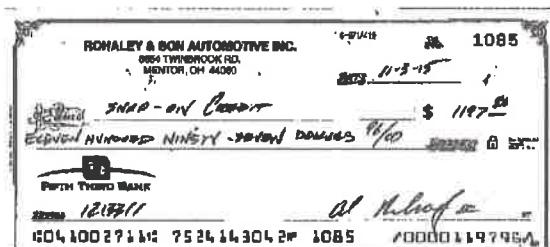
Posting Date 2015 Oct 26 Posting Check Number
1078 Amount \$1,200.00



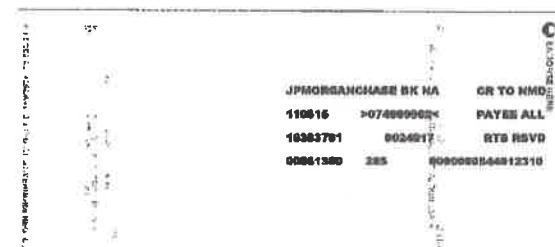
Posting Date 2015 Nov 05 Posting Check Number
1083 Amount \$992.03



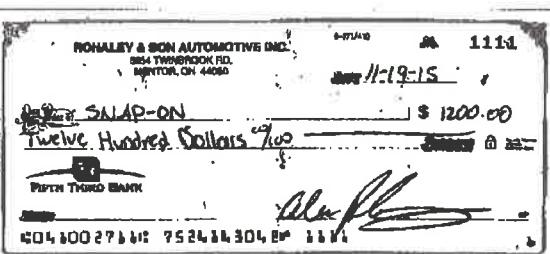
Posting Date 2015 Nov 05 Posting Check Number
1083 Amount \$992.03



Posting Date 2015 Nov 05 Posting Check Number
1085 Amount \$1,197.96



Posting Date 2015 Nov 05 Posting Check Number
1085 Amount \$1,197.96



Posting Date 2015 Nov 23 Posting Check Number
1111 Amount \$1,200.00



Posting Date 2015 Nov 23 Posting Check Number
1111 Amount \$1,200.00

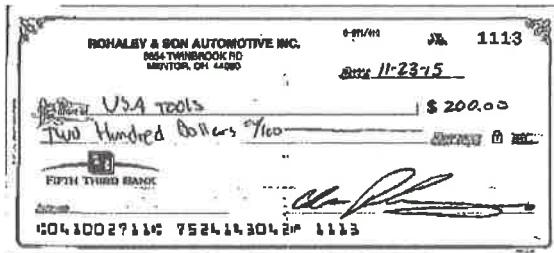
Aug 17 2017

Sworn to and personally appeared before me on the 17th day of August 2017. *John B. Devorak*

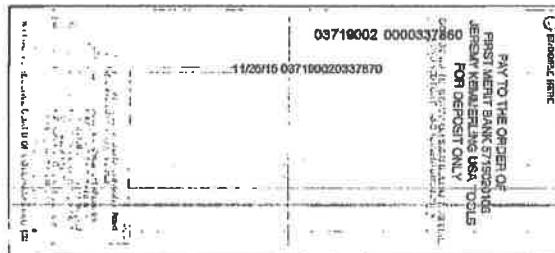
Commission expires: Feb. 13, 2022



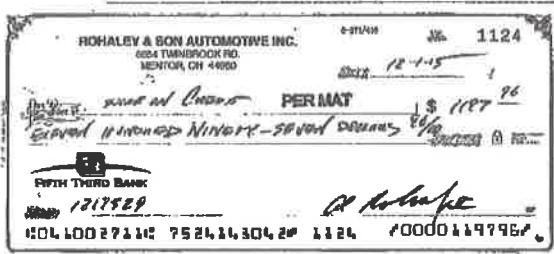
#3042 2015 TOOL CO CHECKS



Posting Date 2015 Nov 25 Posting Check Number 1113 Amount \$200.00



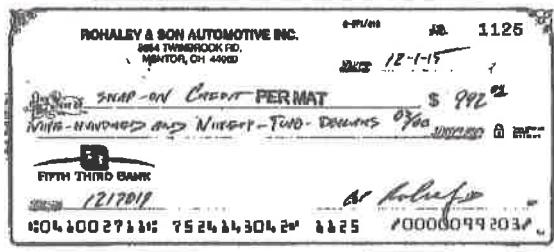
Posting Date 2015 Nov 25 Posting Check Number 1113 Amount \$200.00



Posting Date 2015 Dec 07 Posting Check Number 1124 Amount \$1,197.96

JPMORGANCHASE BN NA CR TO NMID
120715 >074866624 PAYEE ALL
13333838 0034617 RTS REV
00061070 180 0000000044012210

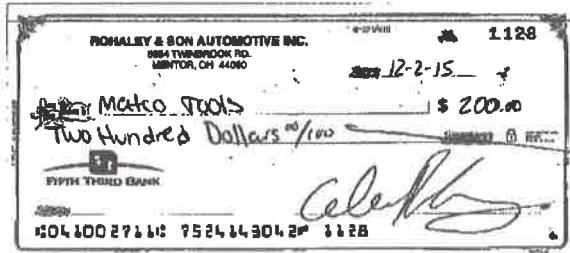
Posting Date 2015 Dec 07 Posting Check Number 1124 Amount \$1,197.96



JPMORGANCHASE BN NA CR TO NMID
120715 >074866624 PAYEE ALL
13333838 0034617 RTS REV
00061070 181 0000000044012210

Posting Date 2015 Dec 07 Posting Check Number 1125 Amount \$992.03

Posting Date 2015 Dec 07 Posting Check Number 1125 Amount \$992.03



Posting Date 2015 Dec 08 Posting Check Number 1128 Amount \$200.00

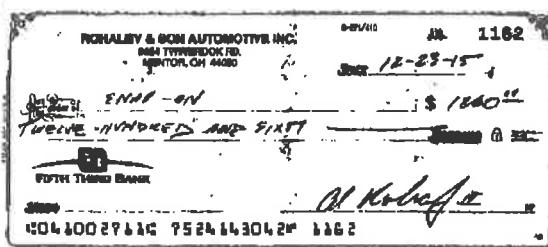
Posting Date 2015 Dec 08 Posting Check Number 1128 Amount \$200.00

Posting Date 2015 Dec 08 Posting Check Number 1128 Amount \$200.00

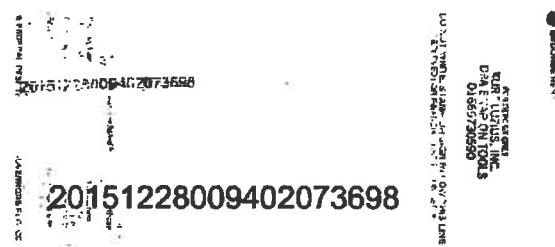
Sworn to and personally appeared before me on this 17th day of August 2017.
John B Devorsky
Commission expires: Feb. 13, 2022



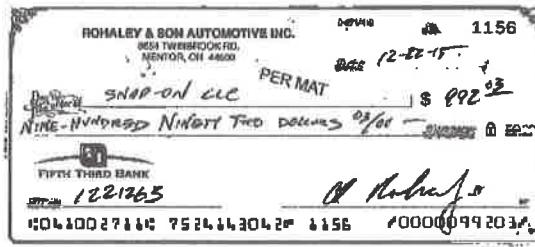
#3042 2015 TOOL CO CHECKS



Posting Date 2015 Dec 28 Posting Check Number
1162 Amount \$1,260.00



Posting Date 2015 Dec 28 Posting Check Number
1162 Amount \$1,260.00



Posting Date 2015 Dec 29 Posting Check Number
1156 Amount \$992.03

JPMORGANCHASE BN NA CR TO NMB
122916 3070000024 PAYEE ALL
10000001 0020077 RTG REV
00001006 200 0000000044612310

Posting Date 2015 Dec 29 Posting Check Number
1156 Amount \$992.03

Cliff Aug 17 2017

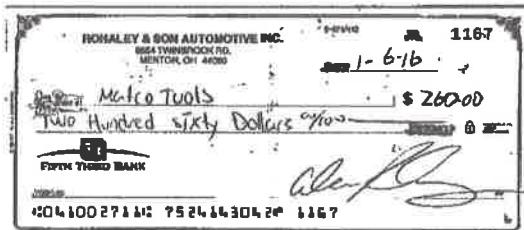


Sworn to and personally appeared before me on this 17th day of
August 2017.

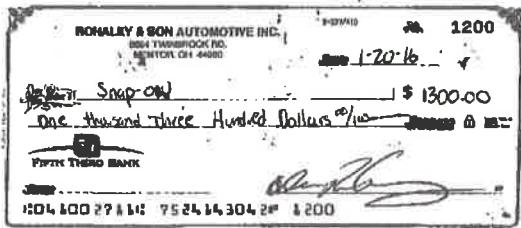
Jonni B Devorsky

Commission expire: Feb. 13, 2022

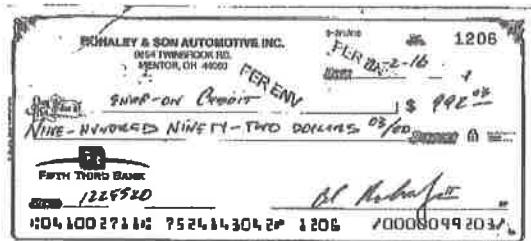
#3042 2016 TOOL CO CHECKS



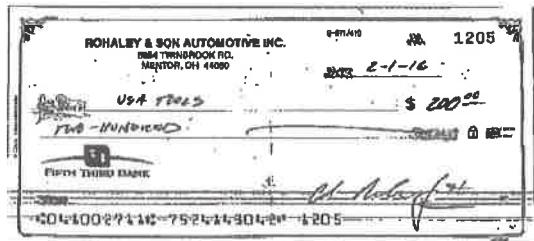
Posting Date 2016 Jan 11 Posting Check Number
1167 Amount \$260.00



Posting Date 2016 Jan 25 Posting Check Number
1200 Amount \$1,300.00



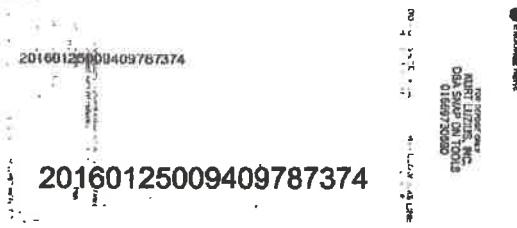
Posting Date 2016 Feb 08 Posting Check Number
1206 Amount \$992.03



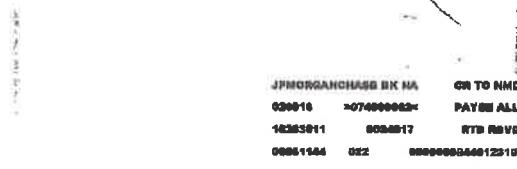
Posting Date 2016 Feb 08 Posting Check Number
1205 Amount \$200.00

Br=&TuiC=1.PC'&TrC=>0417-03/10<.TranC:=01/09/16-St:T.i.:11-132 AM

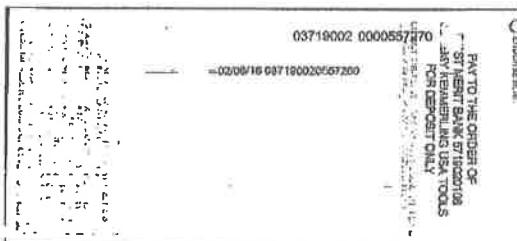
Smith Thruway Tollmaster 3-1288734 Fax 330-587-13301888-443244



Posting Date 2016 Jan 25 Posting Check Number
1200 Amount \$1,300.00



Posting Date 2016 Feb 08 Posting Check Number
1206 Amount \$992.03

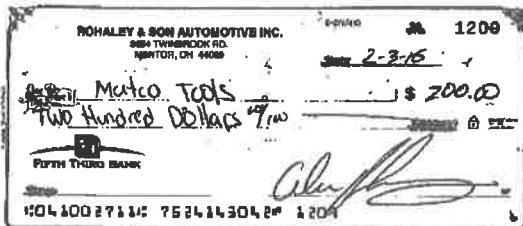


Posting Date 2016 Feb 08 Posting Check Number
1205 Amount \$200.00

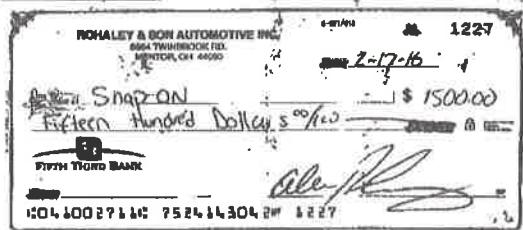
Sworn to and personally appeared before on this 17th day of August 2017
JONNI B DEVORSKY
Commission expire: Feb. 13, 2022



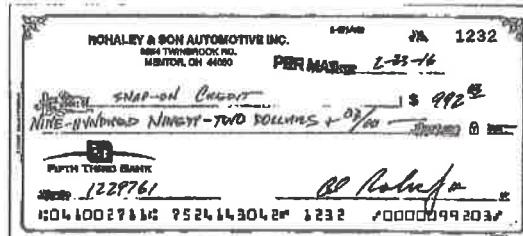
#3042 2016 TOOL CO CHECKS



Posting Date 2016 Feb 09 Posting Check Number 1209 Amount \$200.00



Posting Date 2016 Feb 22 Posting Check Number 1227 Amount \$1,500.00



Posting Date 2016 Feb 29 Posting Check Number 1232 Amount \$992.03

2016022209402692155

Posting Date 2016 Feb 09 Posting Check Number 1209 Amount \$200.00

2016022209402692155

Posting Date 2016 Feb 22 Posting Check Number 1227 Amount \$1,500.00



Posting Date 2016 Feb 29 Posting Check Number 1232 Amount \$992.03

2016022209402692155

Posting Date 2016 Mar 07 Posting Check Number 1247 Amount \$252.13



Posting Date 2016 Mar 07 Posting Check Number 1247 Amount \$252.13

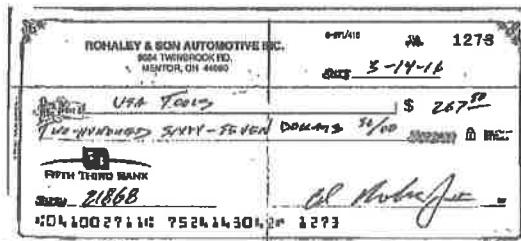
Aug 17 2017

Sworn to and personally appeared before me on this 17th day of August 2017.

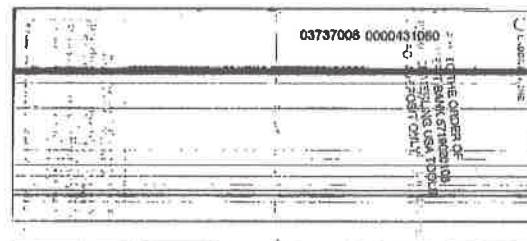
John B. Devorsky
Notary Public
State of Ohio
Comm. Exp. Feb 13, 2022

John B. Devorsky
Commission expires: Feb. 13, 2022

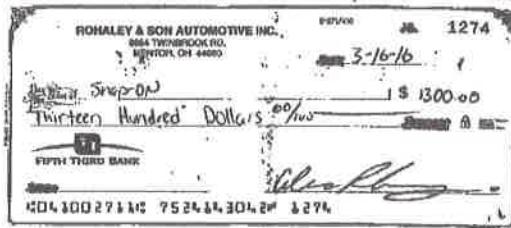
#3042 2016 TOOL CO CHECKS



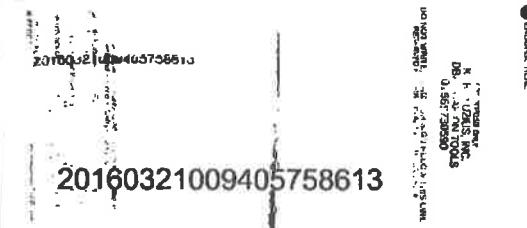
Posting Date 2016 Mar 17 Posting Check Number 1273 Amount \$267.50



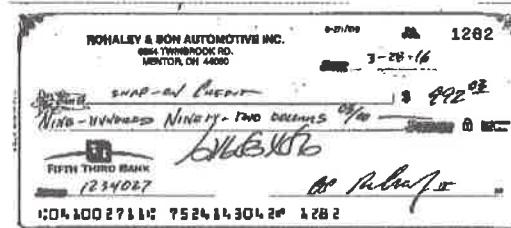
Posting Date 2016 Mar 17 Posting Check Number 1273 Amount \$267.50



Posting Date 2016 Mar 21 Posting Check Number 1274 Amount \$1,300.00



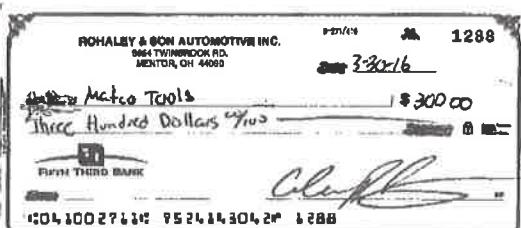
Posting Date 2016 Mar 21 Posting Check Number 1274 Amount \$1,300.00



Posting Date 2016 Apr 01 Posting Check Number 1282 Amount \$992.03



Posting Date 2016 Apr 01 Posting Check Number 1282 Amount \$992.03



Posting Date 2016 Apr 04 Posting Check Number 1288 Amount \$300.00

Posting Date 2016 Apr 04 Posting Check Number 1288 Amount \$300.00

Clayton J. Rohaley Jr. Aug 17 2017

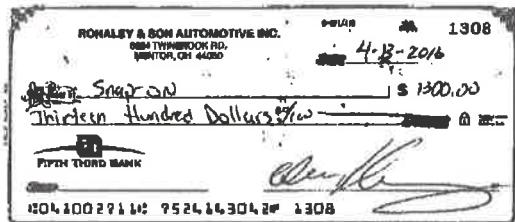
Sworn to and personally appeared before me on this 17th day of August 2017.

Jon B. Devorsky

Commission expires: Feb. 13, 2022



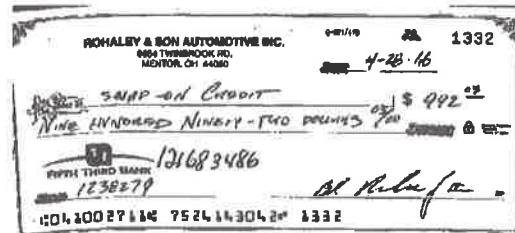
#3042 2016 TOOL CO CHECKS



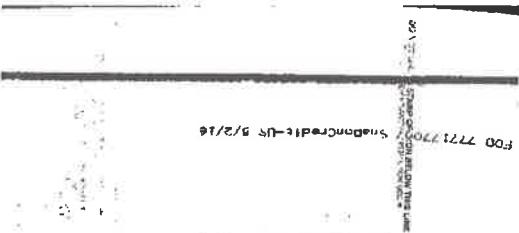
Posting Date 2016 Apr 18 Posting Check Number
1308 Amount \$1,300.00



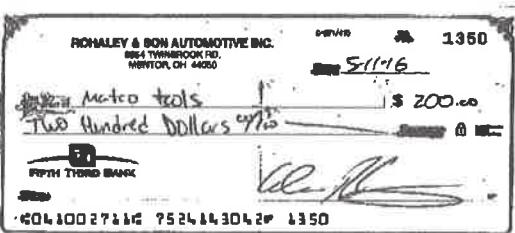
Posting Date 2016 Apr 18 Posting Check Number
1308 Amount \$1,300.00



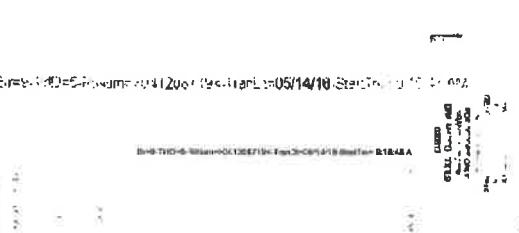
Posting Date 2016 May 03 Posting Check Number
1332 Amount \$992.03



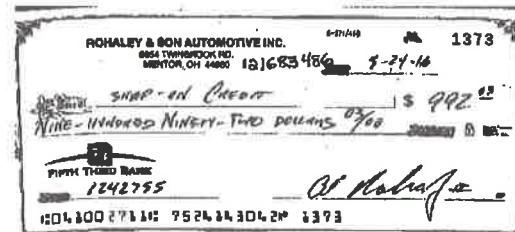
Posting Date 2016 May 03 Posting Check Number
1332 Amount \$992.03



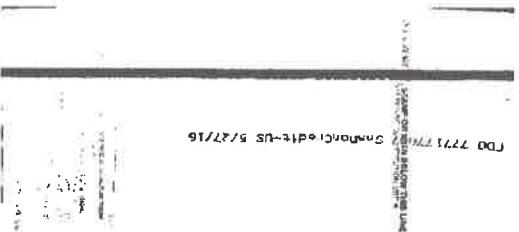
Posting Date 2016 May 16 Posting Check Number
1350 Amount \$200.00



Posting Date 2016 May 16 Posting Check Number
1350 Amount \$200.00



Posting Date 2016 May 27 Posting Check Number
1373 Amount \$992.03



Posting Date 2016 May 27 Posting Check Number
1373 Amount \$992.03

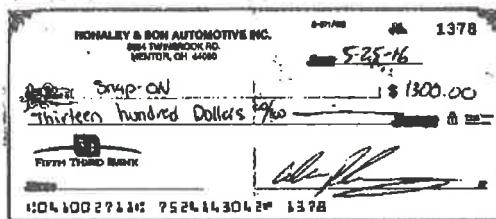
Aug 17, 2017

Sworn to and personally appeared before me on this 10th day of August 2017. *Al Rabie*

Commission expires: Feb. 13, 2022



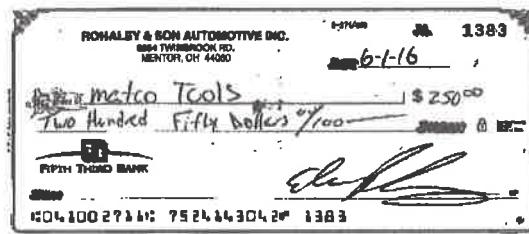
#3042 2016 TOOL CO CHECKS



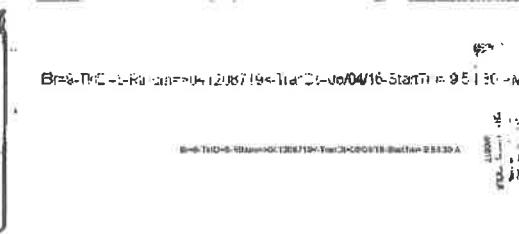
Posting Date 2016 May 31 Posting Check Number
1378 Amount \$1,300.00



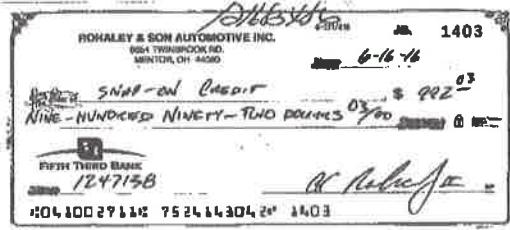
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1378 Amount \$1,300.00



Posting Date 2016 Jun 06 Posting Check Number
1383 Amount \$250.00



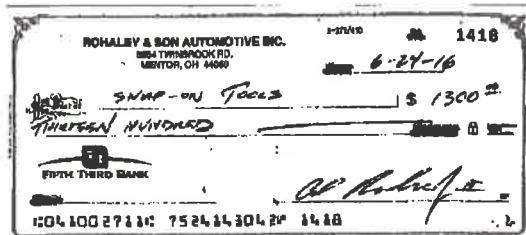
Posting Date 2016 Jun 06 Posting Check Number
1383 Amount \$250.00



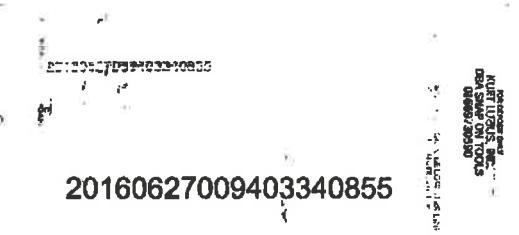
Posting Date 2016 Jun 21 Posting Check Number
1403 Amount \$992.03



Posting Date 2016 Jun 21 Posting Check Number
1403 Amount \$992.03



Posting Date 2016 Jun 27 Posting Check Number
1418 Amount \$1,300.00



Posting Date 2016 Jun 27 Posting Check Number
1418 Amount \$1,300.00

1418 Amount \$1,500.00

Aug 17 2017

Sworn to and personally appeared before me on this 17th day of August 2017.

John B. Devasky

Commission expires: Feb. 13, 2022



ITEM NO.	ROOM(C/F/R/P)*	Brand or Manufacturer	MODEL #	Item Description	Quantity	Purchased Date	REPLACEMENT COST	Use*
1	Snap On		115-5012582-001	Alignment Rack/Complete EEWBB545P4	1	1-4-14	\$42,634.98	
2	Snap On	EEWH1326A		Tire Changer, Tilt Back 2-Speed	1	2-2-14	\$13,580.75	
3	Snap On	EEMS327W		Venust Diagnostic Scanner	1	1-1-2014	\$13,000.00	
4	Snap On	EESP327112		Scanner Update Venus	1	5-28-14	\$2,627.00	
5	Snap On	VERUS UPDATE		UPGRADE15.4 Scan	1	12-18-15	\$1,336.00	
6	Snap On	RECODER		Candi Module ReCoder	1	10-1-15	\$5,350.00	
7	Snap On	EESC318W		Used Scanner Solus Pro	1	9-9-15	\$3,895.00	
8	Snap On			Tool Box	1	9-30-14	\$1,450.00	
9	Snap On			Tool Box (AR)	1	2-1-15	\$2,700.00	
10	Snap On	KRA42411		Roll Cab with Adapters	1	4-30-15	\$2,236.00	
11	Snap On			53 In wide 6 dr WBus	1	12-18-15	\$1,070.00	
12	Snap On	KRA4059FPCM		Top Chest 9 Drawers Blue	1	7-20-16	\$1,290.00	
13	Snap On	KRA4830FPCM		End Cabinet 2 Shelves Blue	1	4-20-16	\$855.00	
14	Snap On	KRA2306PCCM		Tool Box Snap on Purchased Report	1	12-18-15	\$1,000.00	
15	Snap On	CT8850		18v 1/2" Impact Wrench Kit	1	12-18-15	\$559.95	
16	Snap On	CTS761		14.4V 1/4" Hex Drive Kit	1	1-6-16	\$381.95	
17	Snap On	CT761		14.4V 3/8" Impact Wrench Kit	1	1-6-16	\$426.95	
18	Snap On	CTR725A		14.4V 1/4" Ratchet	1	1-6-16	\$406.95	
19	Snap On	CT725		14.4V 1/4" Impact Wrench	1	11-4-15	\$376.95	
20	Snap On	CT8810A		18v 3/8" Impact Wrench	1	11-4-15	\$667.95	
21	Snap On	CDR8850H		18v Hammer Drill	1	11-4-15	\$667.95	
22	Snap On	CTRS8850		18v Saw	1	11-4-15	\$589.95	
23	Snap On	CTGR8850		18v Grinder	1	11-4-15	\$734.95	
24	Snap On	106IPTMM		6 pc Metric Impact Swivel Set	1	7-13-16	\$276.00	
25	Snap On	TPM53		Tool Tire Pressure Sensor System	1	1-15-14	\$1,740.00	
26	Snap On	SDDX70AG		17 pc SD Combo Set	1	3-12-14	\$177.95	
27	Snap On	TDTDM500A		1 Tap & Die Set	1	2-12-14	\$49.95	
28	Snap On	CTR761B		14.4V 3/8" Ratchet Kit	1	12-18-15	\$221.95	
29	Snap On	SGLASA204		4pc Instinct Long Pick Set	1	2-19-14	\$55.95	
30	Snap On	EESP326UJ		Software Update Venus	1	1-15-14	\$1,249.00	
31	Snap On	CKS15FN1030		Torch MG Flexible Neck	1	5-21-14	\$550.00	
32	Snap On	PH1050		Socket Adaptor, Air Hammer 1/2"	1	4-29-15	\$51.50	
33	Snap On	PH1038		1/2" 80 Tooth Flex Head Ratchet	1	4-29-15	\$49.50	
34	Snap On	PH3050		1 Super Duty Air Hammer	1	4-29-15	\$424.95	
35	Snap On	VWB400A		4 pc Carbide Burr whaq	1	2-12-14	\$166.97	
36	Snap On	310SIMMYA		Socket set 1 Metric Impact Deep	1	5-28-14	\$266.00	
37	Snap On	214SIMFMYA		14pc 3/8"Metric Deep Impact	1	5-28-14	\$293.00	
38	Snap On	SHLF80A		1/2" 80 Tooth Flex Head Ratchet	1	5-28-14	\$229.95	
39	Snap On	BOERMSF712		12pc 1/2 Pt Midget Flex Metric set	1	5-28-14	\$281.00	
40	Snap On	THLF72		1/4" Flex Head Ratchet	1	5-28-14	\$119.95	
41	Snap On	210IMFSYA		19mm Impact Deep Socket	1	10-28-15	\$30.25	
42	Snap On	EXDL10		10pc Left Hand Extractor Set	1	4-30-14	\$82.95	
43	Snap On	TDL8		18pc Tap Socket Set	1	3-9-14	\$74.25	

Insured Signature

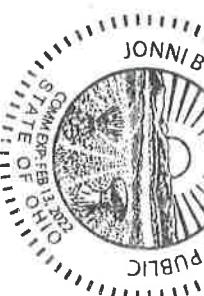


Aug 17 2017

Sworn to and personally appeared before me on this 17th day of August 2017.

Jonni B. Duvally

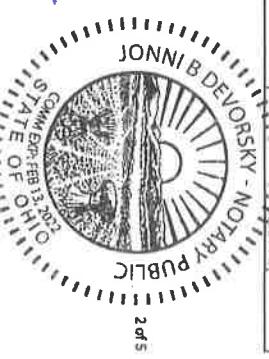
Commission expires: Feb. 13, 2022



ITEM NO.	ROOM-CFRP [®]	Brand or Manufacturer	MODEL #	Item Description	Quantity	Purchased Date	REPLACEMENT COST	Use*
44		Snap On	MG325	3/8" Drive Impact Wrench	1	3-19-14	\$460.95	
45		Snap On	MG725GMGGC	1/2" Drive HD Air Impact Wrench	1	3-19-14	\$524.95	
46		Snap On	TDL3	3pc 1/2" Drive Tap Socket Set	1	3-19-14	\$49.50	
47		Snap On	BK8000	Video Scope	1	4-2-14	\$1,235.00	
48		Snap On	TPMS3U	Software Update	1	4-10-14	\$252.00	
49		Snap On	TPMS3PRG	PK Sensor Add On	1	4-10-14	\$196.00	
50		Snap On	BJP1	Set Ball Joint/Universal Joint Press	1	10-15-14	\$715.00	
51		Snap On	BJP1OPT	Set Ball Joint Adapters	1	10-15-14	\$296.00	
52		Snap On	BJP1HONDA	Set Ball Joint Adapter Honda/Acura	1	10-29-14	\$100.00	
53		Snap On	EAA0247G20A	Tool Mount/De-Mount	1	10-29-14	\$92.00	
54		Snap On	OD2R100A	3/8" Fixed-Ratchet Torque Wrench	1	1-14-15	\$350.00	
55		Snap On	OD1R50	Torque Wrench 1/4" DRIVE	1	2-4-15	\$315.00	
56		Snap On	OD1R200	Torque Wrench 1/4" DRIVE 40-200	1	2-4-15	\$315.00	
57		Snap On	SIMM200	SOCKET IMPACT DEEP 20MM	1	2-4-15	\$31.25	
58		Snap On	SIMM210	SOCKET IMPACT DEEP 21MM	1	2-4-15	\$35.25	
59		Snap On	SIMMF16	SOCKET IMPACT DEEP 16MM	1	2-11-15	\$21.25	
60		Snap On	BC7B	LEDGE HAMMER 5lb	1	2-11-15	\$152.00	
61		Snap On	EECS350	Tester Battery and Electrical	1	2-11-15	\$439.99	
62		Snap On	EAM0043G71A	Tool Plastic Mount/Demount	1	2-11-15	\$45.00	
63		Snap On	FHL80	3/8" Drive Ratchet Handle	1	2-18-15	\$129.95	
64		Snap On	D8TBC129	Set Drill Bits	1	2-18-15	\$444.00	
65		Snap On	LDT40	Set Disconnect AC/Fuel Lines	1	3-4-15	\$265.00	
66		Snap On	EAX0068L00C	OBD-II Data Cable	1	3-18-15	\$73.99	
67		Snap On	VWB400A	4" DC Carbide Burr w/bag	1	3-18-15	\$166.97	
68		Snap On	ASG1033BR	360c Instinct Trim Pad Tool	1	3-18-15	\$104.00	
69		Snap On	ECFBAR300G	Rechargeable Shop Light	1	4-8-15	\$106.00	
70		Snap On	SHBB24	1/2 DRIVE 24" BREAKER BAR	1	4-15-15	\$154.00	
71		Snap On	FKF80	3/8 Flex-Head Ratchet	1	6-17-15	\$109.95	
72		Snap On	EAM0043G71A	Tool Plastic Mount/Demount	5	8-12-15	\$225.00	
73		Snap On	MG325	3/8" Drive Impact Wrench	1	8-19-15	\$460.95	
74		Snap On	RTTEMP8	Multi-Laser Infrared Thermometer	1	8-9-15	\$181.50	
75		Snap On	TBS300	Tubing Bender	1	9-16-15	\$77.50	
76		Snap On	TBS200A	Multipurpose Tubing Bender	1	9-9-15	\$57.75	
77		Snap On	108BTMX	1/4" Drive Knurled Ext. Set	1	10-7-15	\$121.95	
78		Snap On	EAM0043G71A	Tool Plastic Mount/Demount	1	12-23-15	\$90.00	
79		Snap On	WA16	Tool Tie Rod Trucks	1	11-18-15	\$52.75	
80		Snap On	WA17	Tool Tie Rod Adjusting 1 7/8	1	11-18-15	\$55.25	
81		Snap On	96ACF	Needle Nose Pliers	1	4-20-15	\$46.05	
82		Snap On	97ACF	Needle Nose Pliers 8"	1	4-20-15	\$52.25	
83		Snap On	EAA0354L12A	Venus Battery	1	5-4-16	\$262.00	
84		Snap On	609ACP	Duck Bill Pliers 9 1/4	1	5-4-16	\$67.00	
85		Snap On	2-02539A	Venus Power Supply	1	5-4-16	\$63.99	
86		Snap On	6-06321A	Power Cord Venus	1	5-4-16	\$13.99	
87		Snap On	SIMMF16	SOCKET IMPACT DEEP 16MM	1	5-25-16	\$21.25	
88		Snap On	STMM7	Socket Metric Deep 7mm	1	5-25-16	\$23.15	

Sworn to and personally appeared before me on this 17th day of August 2017.
 Insured Signature

Date Aug 17 2017



CONTENTS WORKSHEET

Claim #
028-FR-DHR0975-P

Rohaley and Son Automotive Inc
C/O Chad Leonard
INSURED

Adjuster
Stephan Brashier

ITEM NO.	ROOM-C(FR/P)	Brand or Manufacturer	MODEL #	Item Description	Quantity	Purchased Date	REPLACEMENT COST	Use*
89	Snap On	CTB18850		18V MonsterLithium Floodlight	1	6-1-16	\$95.95	
90	Snap On	CTBB185		18V MonsterLithium Battery	1	6-1-16	\$174.95	
91	Snap On	106IPTMM		6pc 1/4 Drive Impact Swivel Socket	1	6-22-16	\$276.00	
92	Snap On	DBTBC5/16		5/16 Drill Bit	1	6-24-16	\$18.50	
93	Snap On	DBTBC9/32		9/32 Drill Bit	1	6-24-16	\$14.35	
94	Snap On	106IPTMM		6pc 1/4 Drive Impact Swivel Socket	1	7-13-16	\$276.00	
95	Snap On	SVTSRAD272A		Kit Cooling System Filler	1	7-13-16	\$57.00	
96	Snap On	EAM0043G71A		Tool Plastic Mount/Demount	2	7-20-16	\$90.00	
97	Snap On	SMFM13		SOCKET IMPACT DEEP 13MM	1	7-27-16	\$19.00	
98	Snap On	SGA177BR		10.1 90° Radiator Hose Pick	1	7-20-16	\$32.75	
99	Snap On	THLL72		1/4 Drive Handle Ratchet	1	2-17-16	\$119.95	
100	Snap On	RTD48		48pc Master Retreading Tap & Die	1	2-17-16	\$42.95	
101	Snap On	SRPC9000A		Pliers Retaining Ring Fixed Tip 8 3/4	1	2-19-14	\$35.45	
102	Snap On	PWZ0		8 3/16 Plier Wrench	1	5-28-14	\$57.00	
103	Snap On	SRPC9090A		Pliers Retaining Ring Fixed Tip 8 3/4	1	1-15-14	\$35.45	
104	Snap On	SPBB480		HD Striking 48" Prybar	1	1-15-14	\$89.00	
105	Snap On	210IMFSYA		Set Socket Impact Semi-Deep	1	5-28-14	\$183.00	
106	Snap On	214FMYA		Set Socket Metric Impact Shallow	1	5-28-14	\$189.00	
107	Snap On	CJ124A		Pwr Steering & Alt Pulley Puller	1	7-23-14	\$103.00	
108	Snap On	CJ113B		Pulley Installer	1	7-30-14	\$119.00	
109	Snap On	CJ122		2pc Pwr Steering Pulley Installer Set	1	7-30-14	\$170.00	
110	Snap On	CJ117C		Pwr Steering & Alt Pulley Puller	1	7-30-14	\$114.00	
111	Snap On	SGTT110		Set Terminal Tool 10pc	1	8-6-14	\$22.00	
112	Snap On	YA470C		Manual Bearing Packer	1	8-20-14	\$38.75	
113	Snap On	EAA0355L93A		Adaptor J1952 to DB-15M	1	12-17-14	\$24.95	
114	Snap On	TC123C		Tubing Cutter	1	11-13-14	\$32.50	
115	Snap On	EAMM0243G71A		Tool Plastic Mount/Demount	1	9-10-14	\$45.00	
116	Snap On	SMNM24.0		Socket Metric Impact Deep 24mm	1	1-7-15	\$39.25	
117	Snap On	SMNM24.0		Socket Metric Impact Deep 24mm	1	1-7-15	\$42.00	
118	Snap On	TPMA12		Tape Rule 12ft	1	3-4-15	\$24.50	
119	Snap On	TR107A		Tire Valve Tool	1	3-4-15	\$16.95	
120	Snap On	EECR3		CarScan Code Reader	1	4-21-16	\$559.99	
121	Snap On	YA161		Holder Tool Magnetic Bar	2	1-6-16	\$17.50	
122	Snap On	SMFM13		Socket Impact Deep 13MM	1	1-6-16	\$19.00	
123	Snap On	ECFF65C		Flashlight LED 150	1	1-27-16	\$94.75	
124	Snap On	CHN480		Pliers Adjustable Joint 20"	1	3-23-16	\$112.00	
125	Snap On	908ACP		Mini Needle Nose Pliers	1	3-23-16	\$68.25	
126	Snap On	LP404		Set Locking Pliers 4pc	1	4-15-16	\$98.50	
127	Snap On	408ACP		Pliers Needle Nose Mini 35° Bent	1	3-23-16	\$68.25	
128	Snap On	312CF		HD Diagonal Cutter 11"	1	3-23-16	\$77.50	
129	Snap On	STMM10		Socket Metric Deep 10mm	1	3-23-16	\$23.15	
130	Snap On	609ACP		Duck Bill Pliers 9 1/4	1	3-23-16	\$67.00	
131	Snap On	LP7MVR		Pliers Locking Curved Jaw w/Cutter	1	4-13-16	\$26.00	
132	Snap On	LP10GRV		Pliers Locking Grooved Jaw 10"	1	4-13-16	\$111.11	
133	Snap On	IPTM13		Socket Metric Impact Shallow Swivel	1	4-1-16	\$111.11	
134	Snap On	IPTM15		Socket Metric Impact Shallow Swivel	1	4-1-16	\$111.11	
135	Snap On	IPTMMB		Socket Metric Impact Shallow Swivel	1	4-1-16	\$111.11	
136	Snap On	DBTBC732		Drill Bit 7/32	1	3-23-16	\$10.25	

Insured Signature

Sadru to find personally appeared before me on this 17th day of January 2022. Commission expires: Feb. 13, 2022

Date Aug 17 2017

JOHN
UBL

CONTENTS WORKSHEETS
 Claim #
 028-FR-DHRO975-P

INSURED
 Rohaley and Son Automotive Inc.
 C/O Chad Leonard

TRAVELER'S
 Adjuster
 Stephan Brasher

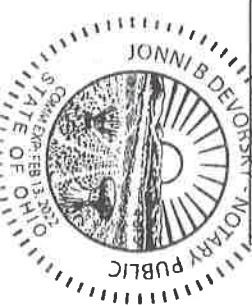
ITEM NO.	ROOM-C/F/R/P*	Brand or Manufacturer	MODEL #	Item Description	Quantity	Purchased Date	REPLACEMENT COST	Use*
137		Snap On	DBTBC121	Set Drill Bits	1	3-23-16	\$245.00	
138		Snap On	WA13A	Tool Tie Rod Adjusting 3 3/4	1	10-7-15	\$44.50	
139		Snap On	WA16	Tool Tie Rod Trucks 4 7/16	1	10-7-15	\$52.75	
140		Snap On	WA17	Tool Tie Rod Adjusting 4 3/4	1	10-7-15	\$55.25	
141		Snap On	WA12A	Tool Tie Rod Adjusting 3 3/4	1	10-7-15	\$51.00	
142		Snap On	SIMM190	Socket Metric Impact Deep 19mm	1	10-21-15	\$30.25	
143		Snap On	IMFMS14	Socket Metric Semi Deep 14mm	1	10-21-15	\$16.90	
144		Snap On	EAC010L69A1	Venus Screen Protector	1	2-26-14	\$26.99	
				MATCO				
145		Matco	FL111113	Clip Strip Aqua	1	1-8-14	\$35.00	
146		Matco	DT4	3-5 Digital Tire Inflator	1	1-8-14	\$108.95	
147		Matco	OFSHD17	17pc End Cap Filter WR	1	1-2-14	\$130.50	
148		Matco	FX85916	16mm Gear Wrench	1	1-2-14	\$47.90	
149		Matco	MDBX9	9pc Deep Well Bolt Extra	1	1-2-14	\$170.16	
150		Matco	BPHSETS	5pc Balpein Hammer Set	1	2-1-14	\$165.24	
151		Matco	JERKY	JERKY	2	2-1-14	\$10.80	
152		Matco	HH5	Hood Prop	1	2-1-14	\$42.95	
153		Matco	ACF-80303	Single Strip LED	1	2-26-14	\$64.90	
154		Matco	MV7201	Fluid Evacuator Plus 8.8	1	4-2-14	\$124.90	
155		Matco	SP3881	2.5 x 9/16 Magnetic Spar	1	4-9-14	\$14.15	
156		Matco	DP2446RB	3/4 x 1/2 Adapter	1	4-9-14	\$51.25	
157		Matco	SR101	4pc Stud Remover Metric	1	4-23-14	\$85.95	
158		Matco	SPG84C	1/4 x 4 ScrewDriver Green Slot set	1	4-30-14	\$110.25	
159		Matco	SALXK3TA	3pc 1/4 in Chr-Lock E	1	5-21-14	\$126.64	
160		Matco	VWVPSN3046	Alligator Clips F/P/WR	1	6-11-14	\$9.67	
161		Matco	H13018-16	Hose F/3018 Inflator	1	9-3-14	\$18.90	
162		Matco	DT4 Battery	Battery	1	9-3-14	\$8.10	
163		Matco	SASE50PA	1 1/4" Dr Silver Eagle M	1	10-1-14	\$129.95	
164		Matco	MBKBK	Tool Box Blank - Black	1	10-29-14	\$36.95	
165		Matco	AC550000	Airlift (Cooling Sys A)	1	12-17-14	\$179.99	
166		Matco	NUTCUP	Magnetic Bowl	1	1-7-15	\$43.90	
167		Matco	V1251	20" Straight Nozzle Blow	1	2-4-15	\$52.03	
168		Matco	SFF2L	Spill Free Funnel with L	1	2-4-15	\$46.54	
169		Matco	AG464	AutoGrip 2-Ton Puller	1	2-4-15	\$98.71	
170		Matco	V1051	4" Full Flow Nozzle BLOWG	1	2-4-15	\$26.46	
171		Matco	SL4R	4200MAH Li-ION Fuel PK	1	2-18-15	\$43.15	
172		Matco	TPS3510	Tailpipe Expander Kit	1	3-14-15	\$279.99	
173		Matco	SAXRBLT	E4 - E10 6pc Chrome	1	3-11-15	\$109.43	
174		Matco	Jerky	JERKY	2	6-24-15	\$12.50	
175		Matco	CT110K	Master Compression Tester	1	8-19-15	\$172.90	
176		Matco	PPSK	Power Probe Butane Solder	1	7-1-15	\$65.87	
177		Matco	MDBX9F	Bolt Ext 13 Deepwell Mat	1	9-9-15	\$23.98	
178		Matco	MDBX9G	Bolt Ext 9/16-14mm Deepwell Mat	1	9-9-15	\$23.98	
179		Matco	MAS4	Mechanics Seat	1	9-16-15	\$102.99	

Insured Signature



Date 1/12/2017

Sworn to and before me personally appeared on this 19th of August 2017.
 John B. Denovsky Commission expire: Feb. 13, 2022



ITEM NO.	ROOM-(C/F/F/F/F)	Brand or Manufacturer	MODEL #	Item Description	Quantity	Purchased Date	REPLACEMENT COST	Use*
180		Matco	SEXS25	25pc Screw Extractor	1	9-30-15	\$99.99	
181		Matco	MBX5	5pc 1/2" Drive Bolt Extractor	1	9-30-15	\$181.83	
182		Matco	TLS788	Torque Limiting AL	1	12-02-15	\$159.50	
183		Matco	H1D14-04	Battery F/D14	1	1-13-16	\$9.98	
184		Matco	H13018-16B	Black Hose W/o Chuck	1	1-13-16	\$19.49	
185		Matco	TOY110A	Toyota Oil Filter Tool	1	2-24-16	\$28.27	
186		Matco	BM581	Axis Assist Knife M390 St	1	3-23-16	\$224.10	
187		Matco	ACMD99-550	Mini Ductor Knife Kit	1	5-11-16	\$159.99	
188		Matco	AC13472A-1734A	Aluminum Gauge Set	1	7-8-16	\$189.50	
189		Matco	4325RP	4S Triple Bay 25" Toolbox Black	1	1-14-14	\$7,000.95	
190		AUDI	S4 2.7L	Audi B5 S4 Parts	1	6-15-15	\$1,100.00	
191		FTG	KO4-Billet	Billet KO4 Turbos (L&R)	2	7-15-15	\$1,800.00	
192		FTG	SS b5s4	Tiptronic Downpipe	1	7-15-15	\$330.00	
193		FTG	Bi Pipe	Bi Pipe	1	7-15-15	\$140.00	
194		FTG	Mat	Mat Housing	1	7-15-15	\$100.00	
195		FTG		Ecu tuned for tiptronic stage3	1	7-15-15	\$500.00	
196		FTG		Divertor valves	1	7-15-15	\$100.00	
197		FTG		Side Mount Intercoolers	2	7-15-15	\$235.00	
198		ECS		Injectors with connectors	1	7-15-15	\$220.00	
199		ECS		PM/PWM/LINE High Flow Fuel Pump	1	8-7-15	\$127.63	
200		ECS	07512113D	07512113D 71D Thermostat	1	8-7-15	\$20.96	
201		ECS	078198479KT2	078198479KT2 Timing Belt Kit	1	8-7-15	\$181.78	
202		ECS	8D0121055T	8D0121055T Radiator Hose Lower	1	8-7-15	\$66.84	
203		ECS	8D012101AG	8D012101AG Radiator Hose Upper	1	8-7-15	\$133.68	
204		ECS	078121082E	078121082E Auxiliary Water Pump Hose	1	8-7-15	\$13.95	
205		ECS	078145755B	078145755B Connection Piece	1	8-7-15	\$21.98	
206		ECS	8D0121109G	8D0121109G Expansion Tank Hose	1	8-7-15	\$39.53	
207		ECS	078145778B	078145778B Oil Supply Line Right	1	8-7-15	\$155.10	
208		ECS	078145736D	078145736D Oil Return Line Right	1	8-7-15	\$164.52	
209		ECS	078145777C	078145777C Oil Supply Line Left	1	8-7-15	\$215.44	
210		ECS	078145735E	078145735E Oil Return Line Left	1	8-7-15	\$209.94	
211		ECS	6PK-855KT	6PK-1856KT Accessory Belt Kit	1	8-7-15	\$67.42	
212		ECS	034-509-0007KT	034-509-0007KT Density Line	1	8-7-15	\$170.05	
213		ECS	002686ECSKT	002686ECSKT Coil Pack	1	8-7-15	\$408.99	
214		ECS	349AKT3	349AKT3 18" Style 349 Wheels (4)	4	7-9-15	\$425.63	
215		ECS	0788121082H	0788121082H Aux Water Pump Hose	1	7-9-15	\$17.29	
216		ECS	078121096AD	078121096AD Oil Cooler Hose	1	7-9-15	\$15.19	
217		ECS	ECS10152KTWBC	ECS10152KTWBC Wheel Spacers Kit 3mm	4	7-9-15	\$109.54	
218		BFG Goodrich	254402ZTR18	BFG G Force 225/40ZR18 (4)	4	7-31-15	\$465.72	
219		Interstate Battery	MT48-H16/60	MT48-H16/60 Battery	1	7-31-15	\$111.95	
220		GMC	1GTC514A6N8515061	GMC SON Custom Truck 1992	1		\$5,000.00	
221		INGEICO	ICT 250 88141033640	Credit Card/Debit Card Machine	1		\$245.95	

Insured Signature

Date Aug 17 2017

*Sworn to and personally appeared before on this 17th day of August 2017
 John B. Devorsky
 Commission expire : Feb. 13, 2022*

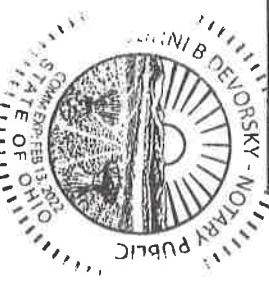


Exhibit 9
1 of 2



Fwd: CANCEL INSURANCE

1 message

Chad Leonard <chadleonard12@gmail.com>
To: Lawrence Bodnar <lab303@att.net>

Thu, Dec 15, 2016 at 11:20 AM

Thank you Larry can you confirm that this is the texts from you and I today about my insurance policy.

Chad- Larry any way you could email me details about Albert calling to cancel the policy? Lawyer wants it for some paperwork. Just a quick summary of the call with rough dates etc..... would help greatly thanks Buddy,
Chad

Larry- 1/3 Albert callef me about a week ago and requested that I cancel the business policy ,effective I I believe he said said mid October. I told him I couldn't
2/3 cancel the policy any other day except the current date but I needed him to email me a request to cancel. He never did. Alec sent me a cancel request vi
3/3 a text on Monday, I ignored it he's not a principle on the policy

Chad- Thank you anyway you can email that? It exactly what I need.

Larry- It was an email, I forwarded it to you

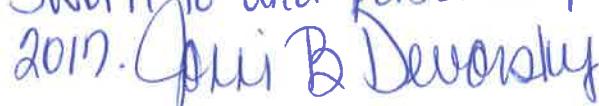
Please confirm above.

Thank you Larry,

Chad Leonard

[Quoted text hidden]

 Aug 17, 2017

Sworn to and personally appeared before on this 11th day of August
2017. 

Commission expire: Feb. 13, 2022



**Fwd: CANCEL INSURANCE**

1 message

Lawrence A. Bodnar <lab303@att.net>
To: Chad Leonard <chadleonard12@gmail.com>

Thu, Dec 15, 2016 at 11:10 AM

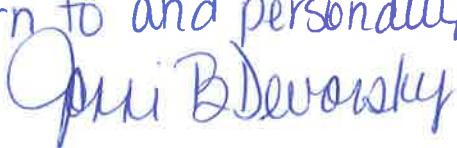
Forwarded message

From: Alec Rohaley <alecrz28@yahoo.com>
Date: Dec 12, 2016 7:29 AM
Subject: CANCEL INSURANCE
To: lab303@att.net
Cc:

PLEASE CANCEL INSURANCE AT 8654 TWINBROOK ROAD. PLEASE CALL ME WHEN U GET THIS. THANKS. 440-266-7762



Aug. 17. 2017

Sworn to and personally appeared before ~~on the~~ ~~17th~~ day of August 2017. 

Commission expires: Feb. 13, 2022





Stephen Sherwood
Unit Manager

P O BOX 3095
Naperville, IL 60566

(630) 961-0820
(865) 829-3975 (fax)
SSherwood2@travelers.com

March 14, 2018

Chad Leonard
Rohaley and Son Automotive Inc
7481 Bremel Dr
Mentor, OH 44060

RE: Insured: Rohaley - Son Automotive Inc
Claim Number: DHR0975
Policy Number: 680 -0E628194
Date of Loss: 01/07/2017
Loss Location: 8654 Twinbrook Rd Mentor OH
Underwriting Company: Travelers Casualty Insurance Company of America (Travelers)

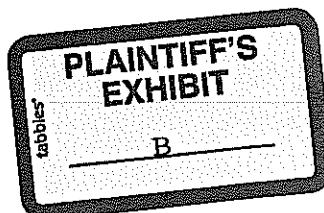
Dear Mr. Leonard,

This letter is in follow up to your request from January 5, 2018 to review our coverage denial on the above referenced claim again. The loss was originally reviewed and denied on July 24, 2018. You requested a review of the denial and submitted additional documentation on August 21, 2018. A review of that information resulted in a confirmation of our initial claim denial. In January and February 2018 additional documents were submitted for another review. We have completed our review of this additional documentation and it does not change our coverage decision. Travelers must maintain its denial of coverage as explained in detail below.

You have questioned the denial of the claim stating that Mr. Rohaley was neither a partner nor employee of Rohaley and Son Automotive after 10/28/2016. Yet, the court documents that you provided continue to refer to Mr. Rohaley as a "Co-owner" of the business after 10/28/2016. Further, the corporate documents for Rohaley and Son Automotive Inc. state Albert C. Rohaley is an incorporator, director, president, treasurer, responsible party and statutory agent of the business. However, as explained in detail below, Mr. Rohaley's status in the business is not the only basis for our coverage position.

Our investigation indicates that there is no evidence of direct physical damage to covered property caused by a covered cause of loss. In addition, the policy conditions were violated by the late reporting of the alleged loss discovered by you on January 7, 2017 but not reported to Travelers until May 24, 2017. It is also noted that the policy was renewed with Travelers on 12/16/2016 without notifying Travelers that the business had closed on 10/28/2016.

Based on the facts reported, the business closed on 10/28/2016 when Mr. Rohaley moved from the business premises and opened another business at a different location. You reported that Mr.



Page 3

Rohaley locked you out of the business in 2015 and court documents describe an ongoing legal dispute between you and Mr. Rohaley as co-owners of Rohaley and Sons Automotive Inc. You advised that by court order, you were allowed to enter the building on October 16, 2016 and that is when you last observed the alleged missing business property.

You advised that you discovered missing business property on January 7, 2017 when you gained access to the business premises after the business closed on October 28, 2016. You also advised that there was no sign of a break in or forced entry into the premises. In contrast, Mr. Rohaley, the co-owner of the business who had access to the property at all times advised that no property was stolen.

POLICY

Travelers issued a policy of insurance to Rohaley and Sons, the named insured, based on representations that it was a corporation doing business as an automotive repair facility. The policy was renewed on 12/16/16. There are several policy limitations and exclusions that preclude coverage for this claim as explained below. As a reference, I have provided the following section of Rohaley and Sons' policy, (MPT1020205), which explains that this loss is not covered:

Throughout this policy the words "you" and "your" refer to the Named Insured shown in the Declarations. The words "we", "us" and "our" refer to the Company providing this insurance.

A. Coverage

We will pay for direct physical loss of or damage to Covered Property at the premises described in the Declarations caused by our resulting from a Covered Cause of Loss.

1. Covered Property

* * *

b. **Business Personal Property** located in or on the buildings described in the Declarations or in the open (or in a vehicle) within 1,000 feet of the described premises.

4. Covered Causes of Loss

RISK OF DIRECT PHYSICAL LOSS unless the loss is

- a. limited in Paragraph A.5., Limitations; or
- b. Excluded in Paragraph B., Exclusions

5. Limitations

* * *

- d. We will not pay for any loss or damage caused by any of the following, even if they are Covered Causes of Loss, if the building where loss or damage occurs has been "vacant" for more than 60 consecutive days before that loss or damage occurs:
 - (1) Vandalism;
 - (2) Sprinkler Leakage, unless you have protected the system against freezing;
 - (3) Building glass breakage;

Page 3

- (4) Discharge or leakage of water;
- (5) "Theft"; or
- (6) Attempted "theft".

With respect to Covered Causes of Loss other than those listed in Paragraphs (1) through (6) above, we will reduce the amount we would otherwise pay for the loss or damage by 15%.

B. Exclusions

1. We will not pay for loss or damage caused directly or indirectly by any of the following. Such loss or damage is excluded regardless of any other cause or event that contributes concurrently or in any sequence to the loss.

These exclusions apply whether or not the loss event results in widespread damage or affects a substantial area.

h. Neglect

Neglect of an insured to use reasonable means to save and preserve property from further damage at and after the time of loss.

2. We will not pay for loss or damage caused by or resulting from any of the following:

h. Dishonest or criminal acts by you, or any of your partners, "members", officers, "managers," "employees" (including leased employees), directors, trustees, authorized representatives, or anyone else to whom you entrust the property for any purpose:

- (1) Acting alone or in collusion with others or;
- (2) Whether or not occurring during the hours of employment

i. Voluntary parting with any property by your or anyone to whom you have entrusted the property.

m. Property that is missing, where the only evidence of the loss is a shortage upon taking inventory, or other instances where there is no physical evidence to show what happened to the property.

n. Loss of property or that part of any loss, the proof of which as to its existence or amount is dependent on:

- (1) Any inventory computation; or
- (2) A profit and loss computation.

3. We will not pay for loss or damage caused by or resulting from any of the following under Paragraphs a. through c. But if an excluded cause of loss that is listed in Paragraphs a. and b. below results in a Covered Cause of Loss, we will pay for the resulting loss or damage caused by that Covered Cause of Loss.

Page 3

b. Acts or decisions, including the failure to act or decide, of any person, group, organization or governmental body.

E. PROPERTY LOSS CONDITIONS

The following conditions apply in addition to the Common Policy Conditions:

3. Duties in the Event of Loss or Damage

a. You must see that the following are done in the event of loss or damage to Covered Property:

(2) Give us prompt notice of the loss or damage. Include a description of the property involved.

(3) As soon as possible, give us a description of how, when and where the loss or damage occurred.

F. COMMERCIAL PROPERTY CONDITIONS

1. Concealment, Misrepresentation or Fraud

This Coverage Form is void in any case of fraud by you. It is also void if you or any other insured, at any time, intentionally conceal or misrepresent a material fact concerning:

- a. This Coverage Form;
- b. The Covered Property;
- c. Your interest in the Covered Property; or
- d. A claim under this Coverage Form.

DECISION

Travelers is maintaining the denial of coverage for all of the reasons stated in our letter dated July 24, 2017. In addition, the policy does not provide coverage for theft from a building that has been vacant for 60 days. You advised that the loss was discovered on 1/7/2017 after the property had been vacant for more than 60 days. As such, the vacancy limitation precludes coverage for the loss.

Any loss caused by neglect of any insured or the acts or decisions of any person including the failure to act or decide is excluded by the policy. Decisions or acts by a co-owner of the named insured may have caused this loss. Please also note that loss of property that can only be shown through inventory is excluded by the policy. As previously advised, dishonest acts by you or any of your partners, members, officers, managers, employees, directors, trustees, or anyone to whom you entrust the property for any purpose are not covered. Voluntary parting with any property by you or anyone else to whom you have entrusted the property is also not covered.

Finally, the policy conditions were not met in this case. You are required to give us prompt notice of the loss as soon as possible. Although you discovered the loss on 1/7/2017, you did not report this loss to Travelers until 5/24/2017 after completing an inventory of the business.

Page 3

Our coverage decision is based on the information and documentation we received during our investigation of this claim. We have reviewed all of the information and documents that you have provided and we have conducted a thorough investigation of the facts surrounding this claim.

Your policy may have other terms, conditions and exclusions that apply to this claim. We do not waive any rights, including our right to deny coverage, for any other valid reason under the policy or at law.

Please review the Legal Action Against Us condition of your policy as it contains important information about the period of time in which you may bring legal action.

We understand that this is not the outcome that you desired but hope you understand how we reached our decision in this case. If you have any questions, please contact me at (630)961-8820 or ssherwo2@travelers.com

Sincerely,

Stephen Sherwood
Property Unit Manager